THE CITY OF SAN DIEGO

ADDENDUM

Project No. 625830
Addendum to EIR No. 30330/304032
SCH No. 2004651076

SUBJECT: **Lumina II Tentative Map and Neighborhood Development Permit**: A request for a TENTATIVE MAP AND NEIGHBORHOOD DEVELOPMENT PERMIT for a 4.98-acre portion of the Central Village Specific Plan, within the Otay Mesa Community Plan. The project would also construct various on- and off-site improvements (i.e., sidewalks, streets, and public utility connections). The project would also widen Cactus Road along the project frontage to provide the ultimate roadway half-width of 76 feet curb-to-curb within a 114-foot right-of-way to be consistent with the Otay Mesa Community Plan Mobility Element for a 4-lane major arterial. The project would allow for the future development of up to 132 multi-family homes through a Neighborhood Development Permit (NDP), which would establish site design, building orientation, building elevations, building floor plans, walls/fencing, and landscaping. The 4.98-acre vacant site is located south of Airway Road, west of Cactus Road, and north of Siempre Viva Road. The land use designation is Community Village per the Otay Mesa Community Plan. The site is within the Central Village Specific Plan (CVSP), which designates the site for Residential- Low Medium to Medium land uses and RM 2-5 (Residential – Multiple Unit) zoning. Additionally, the site is within the Very High Fire Severity Zone, Airport Land Use Compatibility Overlay Zone (Brown Field Airport), Airport Influence Area (Review Area 2-Brown Field Airport), Airports Safety Zones (Safety Zone 6-Brown Field Airport), Federal Aviation Administration Part 77 Notification Area (Brown Field Airport), and 2035 Transit Priority Area. (Legal Description: The north ½ of the southeast ¼ of the southeast ¼ of the southwest ¼ of Section 33, Township 18 South, Range 1 West, San Bernardino Meridian according to United States Government Survey, APN 646-100-54.) Applicant: SARE Investments, LLC.

I. SUMMARY OF ORIGINAL PROJECT

Otay Mesa Community Plan Update

The project site is within the plan boundaries of Otay Mesa Community Plan. The Otay Mesa Community Plan Update (OMCPU) Final Program Environmental Impact Report (Project No. 30330/304032; SCH No. 2004651076) (hereinafter referred to as the OMCPU Final PEIR) was certified by the San Diego City Council on March 11, 2014, Resolution No. R-308810. The OMCPU involved an update to the Otay Mesa Community Plan, a General Plan Amendment, rescission of the Otay Mesa Development District, adoption of a Rezone Ordinance to replace the Otay Mesa Development District with citywide zoning and creation of two new CPIOZs, amendments to the City's Land Development Code (LDC), and an update of the Otay Mesa Community Plan Public Facilities Financing Plan (PFFP). In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15168, the OMCPU Final PEIR examined the environmental impacts of the OMCP.

The OMCP provides for a long-range, comprehensive policy framework for growth and development in the Otay Mesa community through 2062. The OMCP identified a land use strategy with new land use designation proposals to create villages, activity centers, and industrial/employment centers along major transportation corridors, while strengthening cultural and business linkages to Tijuana, Mexico via the Otay Mesa Port of Entry. The land use element established a number of land use planning goals for the OMCP area, such as providing a distribution of land uses that provides sufficient capacity for a variety of uses, facilities, and services needed to serve the planning area: providing distinct villages that include places to live, work, and recreate; providing diversified commercial uses that serve local, community, and regional needs, and providing sufficient industrial land capacity to maintain Otay Mesa as a subregional employment center, among others.

The OMCP included the same nine elements contained in the City's 2008 General Plan, with goals and policies for each element. The nine elements are: Land Use; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services, and Safety; Recreation; Conservation; Noise; and Historic Preservation.

The PEIR concluded that the project would result in significant and unmitigated environmental impacts to air quality, greenhouse gas (GHG) emissions, noise, traffic/circulation, and utilities. The following issue areas were determined to be significant but mitigated to below a level of significance with mitigation: land use, biological resources, historical resources, hydrology/water quality, geology, and paleontological resources. All other impacts analyzed in the PEIR were determined to be less than significant.

Implementation of the OMCP requires subsequent approval of public or private development proposals (i.e., future development) to carry out the land use plan and demonstrate compliance with policies presented in the OMCP.

As it pertains to the OMCP, the site is identified as undeveloped land within the Central District and designated Community Village. Lands with the Community Village designation allow for housing in a mixed-use setting and serves the commercial needs of the community-at-large, including the industrial and business areas. The CVSP zones the site RM 2-5 (Residential – Multiple Unit).

Central Village Specific Plan

The project site is within the plan boundaries of Central Village Specific Plan (CVSP). The CVSP prepared an Addendum to the OMCPU Final PEIR (Project No. 30330/304032; SCH No. 2004651076), referred to herein as "Addendum No. 408329." Addendum No. 408329 was adopted by the San Diego City Council on April 13, 2017, Resolution No. R-311019. The CVSP involved an update to the Otay Mesa Community Plan, adoption of the CVSP, and adoption of a Rezone Ordinance to accommodate the land uses proposed by the Specific Plan.

The CVSP is a 229.2-acre mixed-use village located in the central portion of the Otay Mesa community. The primary purpose of the CVSP is to implement the "City of Villages" strategy in the Central District of the Otay Mesa Community Plan area. The CVSP is a multi-layered plan guiding development of a mixed-use village by providing site-specific land use policies and design regulations. The CVSP provides a walkable, mixed-use village integrating residential, commercial, civic, and recreational uses to create a vibrant living experience.

The CVSP includes a Land Use Standards and Design Guidelines chapter, which incorporates five elements, with goals and policies for each element. The five elements are: Land Use, Mobility, Parks and Open Space, Urban Design, and Infrastructure.

The CVSP establishes land use designations within the Central Village community. Figure 2, *Land Use Plan*, depicts the location of the Lumina II Project in relation to the CVSP Land Use Plan. As shown in Figure 2,, the CVSP designates the 4.98-acre Project site for multi-family residential uses. CVSP Section 3.5, Construction and Development Permits, requires that all development permits proposed with the CVSP comply with the applicable requirements of the San Diego Municipal Code to provide for implementation in accordance with City of San Diego review requirements. The CVSP also requires a Process Two Neighborhood Development Permit (NDP) be processed by the City of San Diego prior to the issuance of any construction permit in order to ensure consistency between a proposed implementing project and the CVSP.

II. SUMMARY OF PROPOSED PROJECT

A request for a TENTATIVE MAP (TM), and a NEIGHBORHOOD DEVELOPMENT PERMIT (NDP) for a 4.98-acre site located within the Central Village Specific Plan (CVSP) portion of the Otay Mesa community.

Figure 1, *Tentative Map No. 2240042*, depicts the proposed TM. TM 2240042 would establish one (1) lot for "Low Density Multi-Family" on 4.46 acres of a 4.98-acre site.

Figure 2, depicts the portions of the CVSP that would be encompassed by TM 2240042. As shown on Figure 2, and for purposes of analysis herein, Lumina II TM 2240042 would implement portions of the CVSP and would allow for the future construction of up to 132 "Low Density Multi-Family" dwelling units on 4.98 acres within CVSP Planning Area 8. Consistent with the population generation factors used in the OMCPU, development of the Project site with up to 132 residential dwelling units would generate a future population increase of approximately 456 persons, utilizing the OMCPU's person per household (pph) ratio of 3.45 (132 dwelling units x 3.45 pph = 456 future residents) (City of San Diego, 2014a, p. LU-17; Table 2-5).

The Project also proposes to vacate 0.4 acre of an existing 28-foot-wide private easement for road and utility purposes on site that was previously recorded on February 19, 1970, in Book 257, Page 37 of Deeds. The easement to be vacated is an east-west oriented easement for road and utility purposes that was never utilized for road and utility purposes and is not needed to serve future development within the CVSP. The existing easement would otherwise bisect residential Planning Area 8 of the CVSP. Access and utilities would instead be provided through the utilities and roadway network included in the approved CVSP, which is accommodated by TM 2240042 and previously-approved TM 1972222 (PTS #555609 Lumina I project), which encompasses improvements to the north, west, south, and east of the Project site.

The Project also proposes an NDP consistent with the requirements of the CVSP. The proposed NDP does not allow for construction of any structures on-site.

The Project does not include any on-site public roadway or infrastructure improvements. Frontage improvements associated with TM 2240042 include half-width improvements to Cactus Road, discussed below.

- **Cactus Road Improvements.** Consistent with the CVSP, Cactus Road would be improved to its ultimate half-width as a "Four-Lane Major Arterial (114-foot ROW)," including 30 feet of travel

way along the northbound side of the road and 30 feet of travel way along the southbound side, a 16-foot-wide raised median, and 8-foot-wide non-contiguous sidewalk within a 26-foot-wide parkway along the Project's frontage.

As outlined by the CVSP, a future development would require a Neighborhood Development Permit (NDP), which would establish site design, building orientation, building elevations, building floor plans, walls/fencing, and landscaping. Additionally, because sale of individual dwelling units is proposed as part of future development, a Condominium Parcel Map would be required.

III. ENVIRONMENTAL SETTING

The environmental setting of the Project site is substantially the same as described in the OMCPU Final EIR. Figure 3, *Aerial Photograph*, depicts the existing conditions of the 4.98-acre Project site. Based on historical aerial photographs, large portions of the site have been used for agricultural and single-family residential uses since at least the 1970s. Under existing conditions, and consistent with the conditions that existed at the time the OMCPU was adopted in 2014, Cactus Road is improved as a two-lane roadway with limited non-contiguous sidewalks on the northbound side of the roadway, no sidewalks on the southbound side of the roadway, and no curb and gutter facilities on either side of the roadway, while the portion of Airway Road east of Cactus Road also is improved as a two-lane facility with no sidewalks and no curb and gutter facilities.

As shown in Figure 4, *Regional Map*, the Project site is located in the southeastern portion of the City of San Diego, within the Otay Mesa community. As shown in Figure 3, surrounding land uses include a mixture of open space, undeveloped lands, agricultural uses (located within the approved CVSP area), and light and heavy industrial uses. Areas to the north, west, and south of the Project site are vacant former agricultural uses, which are planned for residential and commercial mixed-use development pursuant to the CVSP and approved TM 1972222 (PTS No. 555609 Lumina I project). Land uses to the east consist of a mixture of light industrial uses, and greenhouses and agricultural uses. The United States-Mexico international border is located approximately 0.5 mile south of the Project site.

IV. ENVIRONMENTAL DETERMINATION

The City previously prepared and certified the OMCPU Final PEIR (Project No. 30330/304032/SCH No. 2004651076) per Resolution No. R-30881 on March 11, 2014. Based on all available information in light of the entire record, the analysis in this Addendum, and pursuant to Section 15162 and 15164 of the State CEQA Guidelines that:

- There are no substantial changes proposed in the project which will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

- Substantial changes have not occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

- There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental document was certified as complete or was adopted, shows any of the following:

    a. The project will have one or more significant effects not discussed in the previous environmental document;

    b. Significant effects previously examined will be substantially more severe than shown in the previous environmental document;

    c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

    d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous environmental would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Based upon a review of the current project, none of the situations described in Sections 15162 and 15164 of the State CEQA Guidelines apply. No changes in circumstances have occurred, and no new information of substantial importance has manifested, which would result in new significant or substantially increased adverse impacts as a result of the project. Therefore, this Addendum has been prepared in accordance with Section 15164 of the CEQA State Guidelines. The OMCPU Final PEIR has been incorporated by reference pursuant to CEQA Guidelines Section 15150. Public review of this Addendum is not required per the CEQA.

V. IMPACT ANALYSIS

This Addendum includes the environmental issues analyzed in detail in the previously certified PEIR as well as the project-specific environmental analysis pursuant to the CEQA. The analysis in this document evaluates the adequacy of the PEIR relative to the project and documents that the proposed modifications and/or refinements would not cause new or more severe significant impacts than those identified in the previously certified environmental document.

The OMCPU Final PEIR identified significant unmitigated impacts related to noise, traffic/circulation, air quality, GHG emissions, and utilities (solid waste) as these issue areas would not be fully mitigated to below a level of significance. With respect to cumulative impacts, implementation of the OMCPU Final PEIR would result in significant traffic/circulation, air quality, noise, utilities (solid waste), and GHG emissions, which would remain significant and unmitigated.

The OMCPU Final PEIR identified direct significant impacts that would be substantially lessened or avoided if with implementation of the mitigation framework included in the Final PEIR to be implemented by subsequent projects: land use, biological resources, historical resources, human health/public safety/hazardous materials, hydrology/water quality, geology/soils, and paleontological resources.

An overview of the project's impacts in relation to the previously certified PEIR is provided in Table 1, Impact Assessment Summary. The following analysis indicates there would be no new significant impacts, nor would there be an increase in the severity of impacts resulting from the project. Further, there is no new information in the record or otherwise available indicating that there are substantial changes in circumstances that would require major changes to the PEIR.

A comparison of the project's impacts related to those of the certified OMCPU Final PEIR is provided below in Table 1, *Impact Assessment Summary*.

Table 1 Impact Assessment Summary

Environmental Issues	OMCPU Final PEIR Finding Analysis	OMCP Mitigation	Project	Project Level New Mitigation?	Project Resultant Impact
Land Use	Significant but mitigated	Yes	No new impacts	No	Less than Significant
Visual Effects and Neighborhood Character	Less than significant	No	No new impacts	No	Less than Significant
Air Quality/Odor	Significant, unmitigated	Yes	No new impacts	No	Significant, unmitigated
Biological Resources	Significant but mitigated	Yes	No new impacts	Yes	Mitigated to a Level Less Than Significant
Historical Resources	Significant, but mitigated	Yes	No new impacts	Yes	Mitigated to a Level Less than Significant
Human Health/Public Safety/Hazardous Materials	Significant, but mitigated	Yes	No new impacts	No	Less than Significant
Hydrology/Water Quality	Significant but mitigated	Yes	No new impacts	No	Less than Significant
Geology/Soils	Significant but mitigated	Yes	No new impacts	No	Mitigated to a Level Less than Significant
Energy Conservation	Less than significant	No	No new impacts	No	Less than significant
Noise	Significant, unmitigated	Yes	No new impacts	No	Significant, unmitigated
Paleontological Resources	Significant but mitigated	Yes	No new impacts	No	Less than Significant
Transportation/Circulation	Significant, unmitigated	Yes	No new impacts	Yes	Mitigated, remains Significant, unmitigated
Public Services	Less than significant	No	No new impacts	No	Less than Significant

Utilities	Significant, unmitigated	Yes	No new impacts	No	Less than significant
Water Supply	Less than significant	No	No new impacts	No	Less than significant
Population and Housing	Less than significant	No	No new impacts	No	Less than significant
Agricultural and Mineral Resources	Less than significant	No	No new impacts	No	Less than significant
Greenhouse Gas Emissions	Significant, unmitigated	Yes	No new impacts	No	Less than significant

Land Use

OMCPU Final PEIR

The 2014 Otay Mesa Community Plan Update (OMCPU) EIR found that the OMCPU's goals, policies, and programs are consistent with the land use plans, policies, and regulations of the City's General Plan; Land Development Code; Brown Field Airport Land Use Compatibility Plan; and the San Diego Association of Governments' (SANDAG) Regional Comprehensive Plan. Accordingly, the OMCPU Final PEIR concluded that the OMCPU would have a less-than-significant impact due to conflicts with other planning documents and no mitigation would be required. (City of San Diego, 2014b, pp. 5.1-38 through 5.1-46)

The OMCPU Final PEIR found that the OMCPU's land use plan would locate residential land uses in close proximity to industrial uses, which would result in potential impacts associated with the collocation of incompatible land uses. The OMCPU Final PEIR anticipated that the CVSP would incorporate transitional land uses, such as commercial uses, and also landscaping, parking, and setbacks, in the interface area and that the residential uses would then be separated from industrial uses. Additionally, the OMCPU Final PEIR noted that the Otay Mesa CPIOZ would apply to the areas designated for industrial uses. The CPIOZ would ensure consistency of all future development within these areas with CPU direction and policy, including otherwise future ministerial projects. Moreover, the OMCPU Final PEIR found that there are various policies contained within the OMCPU that would serve to limit incompatibilities at the interface between residential and industrial uses and that would promote both a desirable residential community and opportunities for continuing industrial development. Consistent with the General Plan Economic Prosperity Element and its Residential and Industrial Collocation and Conversion Policies, the OIMCPU EIR found that the OMCPU would minimize land use conflicts and preserve the most important types of industrial land within the OMCPU area. The OMCPU Final PEIR concluded that with implementation OMCPU policies and performance standards, potential impacts associated with the collocation of incompatible land uses would be reduced to less-than-significant levels.

The OMCPU Final PEIR found that implementation of the OMCPU would not conflict with the intent and purpose of the Brush Management regulations of the LDC; however, the OMCPU Final PEIR found that the OMCPU would have the potential to conflict with the intent and purpose of the ESL regulations and the Historical Resources regulations. The OMCPU Final PEIR concluded that with implementation of Mitigation Frameworks LU-1a and LU-1b, generally requiring development proposals to be consistent with the OMCPU, base zone regulations, and CPIOZ Type A supplemental regulations, and requiring future implementing developments to demonstrate that there are no

biological or archeological resources present on the Project site, the OMCPU Final PEIR concluded that potentially significant impacts due to conflicts with the ESL and Historical Resources regulations would be reduced to below a level of significance.

The OMCPU Final PEIR included an analysis of potential impacts due to a conflict with the City's Multiple Species Conservation Program (MSCP) Subarea Plan in OMCPU Final PEIR Subsection 5.1, Land Use. As stated in the OMCPU Final PEIR, future development in the OMCPU area would be evaluated at the project-level for consistency with the MHPA Land Use Adjacency Guidelines. The OMCPU Final PEIR found that although implementation of the OMCPU would introduce land uses adjacent to MHPA which would potentially result in a significant impact, compliance with established development standards and other applicable regulations contained in the OMCPU as well as the MSCP Subarea Plan's Land Use Adjacency Guidelines, MSCP Management Policies and Directives, and Area Specific Management Directives were found to reduce impacts to below a level of significance. Additionally, impacts due to a conflict with the MHPA Land Use Adjacency Guidelines were determined to be less than significant with implementation of Mitigation Framework LU-2. (City of San Diego, 2014b, pp. 5.1-58 through 5.1-64)

Project

The Project is located within the boundary of the Central Village Specific Plan (CVSP) and the Project would be fully consistent with the CVSP. The CVSP implements the City's General Plan, the City's Climate Action Plan (CAP), and the OMCPU, which are policy documents with applicability to the geographic area of the Project site. Thus, because the Project would be consistent with the CVSP, the Project would also be consistent with all other applicable policy documents with jurisdiction over the Project. Future development on the Project site also would be required to comply with the CVSP. There are no components of the Project that would obviate the need for future development within the CVSP to also demonstrate compliance with the General Plan, CAP, OMCPU, and CVSP. Moreover, because the CVSP is consistent with the General Plan and OMCPU, the Project is thus inherently consistent with applicable land use plans, policies, and regulations, including but not limited to the General Plan, OMCPU, and CVSP. Accordingly, the Project would not conflict with the land use plans, policies, and regulations of the City's General Plan, OMCPU, and CVSP; Land Development Code; Brown Field Airport Land Use Compatibility Plan; and/or the SANDAG Regional Comprehensive Plan.

Furthermore, the Project would be consistent with the City's CAP, which is applicable to the Project area. Please refer to the discussion of thresholds under the Greenhouse Gas Emissions Subsection of this document for a more detailed analysis of the Project's consistency with the City of San Diego CAP.

Accordingly, and consistent with the finding of the OMCPU Final PEIR, the Project would have a less-than-significant impact associated with a conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Future development would include residential land uses in accordance with the CVSP. Future development would locate residential land uses in close proximity to off-site industrial uses to the east and south. However, future residential land uses would be physically separated from industrial

uses to the east of the Project site by Cactus Road and from industrial uses to the south by off-site residential development within the CVSP area and open space.

Furthermore, future development on the Project site would be required to comply with CVSP policies and design standards that were adopted to avoid and reduce potential impacts resulting from the collocation of on-site residential land uses with off-site industrial land uses. For example, the following policy is incorporated into the CVSP to address collocation of on-site residential and off-site industrial uses, and would apply to future development that would result from Project approval (T&B Planning, 2017):

Policy 2.5-44 Address the challenges presented by the collocation of industrial and residential uses by implementing the following design strategies:

- Provide landscape screening and/or patio walls to reduce noise impacts and protect the privacy of residential units along high traffic streets and intense uses.
- Address noise through the use of berms, planting, setbacks, and architectural design rather than with conventional wall barriers for generating uses.
- Minimize the number of residential units that have window and door openings that afford views into adjacent industrial uses located east of the Central Village. Whenever possible, orient the short end of buildings towards industrial uses.

Additionally, the future development would be required to comply with the following Design Standard from the CVSP, which was adopted to preclude localized air quality impacts to future residents from the SR-905 as well as from nearby light and heavy industrial developments located east and south of the Project site (T&B Planning, 2017):

Design Standard 2.2-11: Mechanical air quality filtration systems shall be required for residential units in Planning Areas 9, 10, 11, 12, and 13 (the planning areas closest to SR-905) and for residential units in Planning Areas 5 and 8 that are within 500 feet of the Specific Plan's eastern and southern boundary lines (the planning areas closest to off-site light and heavy industrial uses) as part of implementing development projects. The filtration systems shall have at least a Maximum Efficiency Reporting Value (MERV) of 13. These systems are required to improve indoor air quality in areas of the Specific Plan that could be most affected by vehicular-related air pollutant emissions along SR-905 and nearby stationary sources associated with off-site industrial land uses.

As previously indicated, a Neighborhood Development Permit (NDP) would be required prior to development on the Project site. The City would review the future NDP for conformance with all applicable policies and design standards of the OMCPU and the CVSP, including policies and design standards adopted to address collocation of residential and industrial land uses. Furthermore, as part of the future NDP and/or building permits, the Project Applicant would be required to prepare a noise study to identify noise abatement measures to address traffic-related noise along Cactus Road and Airway Road, as required by General Plan Policy NE-A.4 and OMCPU Policy 9.2-2.

Consistent with the findings of the OMCPU Final PEIR, mandatory compliance with the OMCPU and CVSP design standards and policies would ensure that the r Project and uses associated with future

development are compatible with surrounding industrial land uses. Therefore, implementation of the Project would not result in any new impacts or increase the severity of a previously identified significant impact associated with the collocation of residential and industrial uses, or with the conversion of agricultural lands to a residential community, as previously analyzed in the OMCPU Final PEIR.

The Project not located within any ESL and the Project would not cause an impact due to a conflict with the purpose and intent of the ESL regulations. A Bulletin 580 Historic Resources Assessment (*Appendix C2*) was prepared for the Project site. As noted in the Historical Resource Report, the Project would not result in a conflict with the Historical Resources Regulations. In addition, the Project complies with the Brush Management Regulation of the LDC. Accordingly, and consistent with the findings of the OMCPU Final PEIR, the Project would have a less-than-significant impact due to a conflict with the purpose and intent of the ESL regulations, the Historical Resources regulations, and the Brush Management regulations of the LDC.

The Project would not impact any MHPA-designated areas and the Project site is not adjacent to any MHPA lands. The Project includes a site-specific Biological Resources Letter Report (BRR) (*Appendix B*), which found that the Project would be consistent with the City MSCP Subarea Plan and the MHPA. The Project's impacts due to conflicts with adopted environmental plans, such as the MSCP and MSCP Subarea Plan's Land Use Adjacency Guidelines would be less than significant.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCPU Final PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR result.

VISUAL EFFECTS AND NEIGHBORHOOD CHARACTER

OMCPU Final PEIR

The OMCPU Final PEIR found that there were no scenic vistas or scenic viewing areas identified by the previously-adopted Otay Mesa Community Plan or the City's General Plan for the OMCPU area. Additionally, the OMCPU Final PEIR found that implementation of the OMCPU would preserve a majority of the existing public views of canyons and mesas. In addition, the OMCPU Final PEIR found that the OMCPU requires the establishment of view corridors and gateways to protect views of public resources. As such, the OMCPU Final PEIR concluded that impacts to the visual quality of the area, with respect to views from public viewing areas, vista, and open spaces, would be less than significant. (City of San Diego, 2014b, pp. 5.2-15 through 5.2-20)

The OMCPU Final PEIR found that the existing undeveloped parcels and scattered industrial, commercial, and rural residences along the SR-905 corridor (i.e., within the Central District) would transition over the next 30 years to a more urbanized, cohesive land use arrangement. The visual character of the Central District was described as transitioning from existing low-rise, single-use structures and blocks, to vertically and horizontally mixed-use structures and blocks. Under the OMCPU, the resulting building mass, scale, and heights were found to be those that are characteristic of medium-high density mixed-use and transit-focused development, with building heights ranging from three to four stories up to a maximum of six stories. The OMCPU Final PEIR also found that mandatory compliance with applicable regulatory requirements that implement the goals and policies of the General Plan and OMCPU would ensure that impacts to the visual character

and quality of the Central Village and surrounding areas would be less than significant. Furthermore, the OMCPU Final PEIR concluded that the Central District is already developed with industrial and agricultural uses, and therefore the proposed intensification of uses within the Central District (including the Central Village) is not considered a significant change to the aesthetic character in the Central District and would be compatible with the surrounding development in terms of bulk, scale, materials, and style. Impacts were concluded to be less than significant, requiring no mitigation. (City of San Diego, 2014b, pp. 5.2-20 through 5.2-23)

The OMCPU Final PEIR found that the existing undeveloped parcels and scattered industrial, commercial, and rural residences along the SR-905 corridor (i.e., within the Central District) would transition over the next 30 years to a more urbanized, cohesive land use arrangement. The OMCPU Final PEIR noted that specific grading quantities associated with future development were unknown; however, the OMCPU Final PEIR determined that significant impacts due to substantial changes to natural landforms and/or ground relief features would occur if one of the following conditions are met. The first condition is related to ESL Regulations and Steep Hillside Guidelines, while the remaining conditions include grading of manufactured slopes taller than 10 feet and fill slopes exceeding 5 feet in height. The OMCPU Final PEIR also noted that per the City's Significant Determination Thresholds, grading impacts would not be considered significant if certain conditions applied. The OMCPU Final PEIR found that all future development proposals in the OMCPU area would be reviewed to determine if the grading plans demonstrated compliance with the grading criteria in the OMCPU Final PEIR, or if alternative design features would be required. Furthermore, the OMCPU Final PEIR found that mandatory compliance with applicable regulatory requirements and OMCPU Policies would ensure that impacts associated with changes to natural topography would be less than significant and would require no mitigation. (City of San Diego, 2014b, pp. 5.2-24 through 5.2-25)

The OMCPU Final PEIR found that future development would be required to comply with the City's Grading Regulations, General Plan policies, and OMCPU policies. As such, the OMCPU Final PEIR concluded that assuming compliance with these policies, impacts associated with the modification of unique physical features that would create a negative visual appearance would be less than significant. (City of San Diego, 2014b, pp. 5.2-25 through 5.2-26)

Project

The Project consists of a Tentative Map (TM) to implement a portion of the CVSP. Future development within the TM area would be required to obtain an NDP, which would identify plans for site design, building orientation, building elevations, building floor plans, site grading, and landscaping. Future development would require an NDP, and the City would ensure that all design elements associated with the future development would comply with the design standards and policies of the CVSP, including standards and policies related to open space connections and view corridors, architectural design, and landscape design. Mandatory compliance with the policies and requirements of the CVSP would ensure that future development on site does not adversely affect the visual quality of the area. There are no components of the Project or future development in the TM area that would adversely affect public views in the area, such as from existing informal trails located within open space areas located approximately 0.3 mile west of the Project site.

The Project site accommodates partial views of Otay Mountain and Jamul Mountain, and would not impact any off-site public viewing areas, vistas, or open spaces. Therefore, impacts to the visual

quality of the area, with respect to views from public viewing areas, vista, and open spaces, would be less than significant.

Under existing conditions, and consistent with conditions that existed at the time the OMCPU Final PEIR was certified in 2014, the Project site is developed with a single-family residential structure and has ornamental trees within the southwest corner. The Project site does not have any rock outcroppings or historical buildings. Implementation of the Project would result in the demolition of the existing structures and ornamental trees.

According to the California Department of Transportation (Caltrans) list of *Designated and Eligible State Scenic Highways* the nearest officially designated State scenic highway to the Project site is a portion of State Route 52 (SR-52) from Santo Road to Mast Boulevard. The Project site is located approximately 20 miles southeast of this portion of SR 52. Due to the Project site's distance and topography, implementation of the Project would not result in any impacts to scenic resources within a State scenic highway.

Land uses surrounding the Project site include vacant former agricultural uses planned for residential and commercial mixed-uses in accordance with the CVSP and approved TM 1972222 (PTS No. 555609 Lumina I project) to the north, west, and south, and light industrial uses greenhouses, and agricultural uses to the east (Google Earth, 2020). The Project does not propose any changes to the site's existing land use designation as applied to the site by the CVSP. The CVSP designates the Project site for "Residential – Low Medium to Medium (10-29 du/ac)". The Project would be fully consistent with the CVSP.

Regarding visual quality and character, the Project consists only of a TM. Future development on-site would be in accordance with the land uses envisioned by the OMCPU, as amended by the CVSP. Furthermore, the CVSP includes detailed architectural and landscaping policies and design standards that would help ensure that future development on-site does not degrade the aesthetic character of the Project site or its surroundings in terms of bulk, scale, materials, or style. Refer to the CVSP Section 2.5, *Urban Design Element*, for more information. (T&B Planning, 2017)

In addition, future development within the Project area would be required to comply with applicable regulatory requirements that implement General Plan goals and policies. As part of the City's discretionary review process for future development within the Project area, the City will review each development application for compliance with the General Plan as well as the policies contained in the OMCPU and CVSP. Specifically, General Plan Policy UD A.5 requires buildings to be designed to "contribute to a positive neighborhood character and relate to neighborhood and community context" (City of San Diego, 2014b, Table 5.2-1).

Furthermore, future development proposals are required to comply with the CVSP, which includes policies and design standards addressing Urban Design, adherence to which would prevent future development projects from negatively affecting the visual quality of the area or strongly contrasting with the surrounding development and natural topography. Policies and design standards of the CVSP Urban Design Element address the CVSP's seven design principals, including: 1) Activity Nodes and Gateways; 2) Open Space Connections and View Corridors; 3) Gathering Spaces and Interior Courts; 4) Clear and Interconnected Circulation; 5) Parking Internal to Block; 6) Landscape Buffers as Screening; and 7) Positive Frontage and Connecting Land Use Interfaces (T&B Planning, 2017). The

CVSP contains policies that would require future development projects to be compatible with the design theme envisioned for the Project area pursuant to Section 2.5, *Urban Design Element*, of the Specific Plan.

Thus, and consistent with the conclusion reached in the OMCPU Final PEIR, both the Project and future development would not result in a severe contrast with the surrounding area's aesthetic character in terms of bulk, scale, materials and style, or natural topography, and impacts would be less than significant.

Under existing conditions, the Project site is characterized by relatively level terrain ranging from 485 feet above mean sea level (amsl) in the southwestern portion of the Project site to 494 feet amsl on the northern portion of the Project site. The Project would include grading of 4.69 acres of the entire approximately 4.98-acre Project site. The Project generally would maintain the site's existing topography. A total of 26,200 cubic yards (cy) of cut and 3,300 cy of fill is anticipated, with an export of 22,900 cy of soil materials required. The soil materials would be exported from the Project site but would be utilized on the previously-approved TM No. 1972222 (PTS No. 555609 Lumina I project) boundaries; thus, export from the vicinity of the Project site would not be required. Furthermore, slopes proposed as part of the Project were evaluated as part of a site-specific Geotechnical Report, which is contained as *Appendix F*. The Geotechnical Report evaluates the proposed grading plan, and incorporates measures to address slope stability. Future development would be required to comply with the recommendations of the Geotechnical Report and/or any subsequent geotechnical investigations that may be required as part of future applications. Thus, and consistent with the conclusion reached in the OMCPU Final PEIR, the Project would not result in a substantial change to natural topography or other ground surface relief features, and impacts would be less than significant.

The Project site is not located within proximity to steep hillside areas. The Project site is generally flat and does not contain any natural canyons or hillside slopes in excess of 25 percent gradient. As such, the development of the Project would not have the potential to modify any unique natural physical features. There are no other unique physical features on the Project site. Therefore, and consistent with the conclusion reached in the OMCPU Final PEIR, the Project would not result in a negative visual appearance due to the loss, covering, or modification of any unique physical features including natural canyon or hillside slopes in excess of 25 percent gradient, and impacts would be less than significant.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCPU Final PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR result.

AIR QUALITY/ODOR

OMCPU Final PEIR

The OMCPU Final PEIR found that implementation of the OMCPU land use plan would result in fewer emissions than the adopted community plan upon which the current Regional Air Quality Strategy (RAQS) for the San Diego Air Basin (SDAB) was based. However, the OMCPU Final PEIR concluded that while it is not anticipated that construction activities under the OMCPU would result in

significant air quality impacts, impacts were concluded to be significant and unavoidable because air emissions from future implementing development projects within the OMCPU area could not be adequately quantified at the time the OMCPU Final PEIR was prepared. For operational conditions, the OMCPU Final PEIR found that the OMCPU would be consistent with adopted regional air quality improvement plans and would represent a decrease in emissions as compared to the assumptions used in the RAQS. However, operational air pollutant emission impacts were disclosed as significant and unavoidable because air pollutant emissions from future developments that would implement the OMCPU could not be adequately quantified by the OMCPU Final PEIR at the policy level. Accordingly, due to the potential conflict with the RAQS and the State Implementation Plan (SIP) during construction and operational activities associated with OMCPU implementation, impacts were disclosed as significant and unavoidable. A statement of overriding considerations was adopted for these impacts. (City of San Diego, 2014b, pp. 6-8, 6-9, 11-5 and 11-6)

The OMCPU Final PEIR found that emissions resulting from the implementation of the OMCPU would potentially exceed daily SDAPCD emissions thresholds and result in a cumulatively-considerable net increase of criteria pollutants during both construction and long-term operation of implementing development projects. Although the analysis of construction-level impacts demonstrated that impacts would be less than significant, the OMCPU Final PEIR concluded that impacts would be cumulatively considerable and unavoidable due to the possibility that multiple projects could be under construction simultaneously and could thereby cumulatively exceed the SDAPCD construction-related thresholds. Under long-term operating conditions, the OMCPU Final PEIR determined that air quality emissions would be reduced under the OMCPU compared to the previously adopted community plan but also concluded that emissions under the OMCPU still would exceed the SDAPCD operational thresholds. Because air emissions from future developments within the OMCPU area could not be adequately quantified at the time the OMCPU Final PEIR was certified due to the fact that the OMCPU is a policy document and no specific development was proposed, this impact was disclosed as significant and unavoidable. The OMCPU Final PEIR identified Mitigation Frameworks AQ-1 and AQ-2, which require the incorporation of best available control measures and reasonable mitigation to reduce emission levels. The OMCPU Final PEIR concluded that even with implementation of Mitigation Frameworks AQ-1 and AQ-2, impacts due to potential violation of air quality standards and cumulatively-considerable net increase of criteria pollutants for which the region is in non-attainment would be significant and unavoidable. A statement of overriding considerations was adopted for these impacts. (City of San Diego, 2014b, pp. 5.3-22 and 5.3-23)

The OMCPU Final PEIR found that there were three intersections with a potential for Carbon Monoxide (CO) "Hot Spots": Otay Mesa Road at Innovative Way; Old Otay Mesa Road at Beyer Road; and Otay Valley Road and Heritage Road. The analysis concluded that the CO concentrations at these intersections would not exceed the ambient air quality standards. Therefore, the OMCPU Final PEIR concluded that implementation of the OMCPU would result in less-than-significant impacts with respect to CO hot spots. (City of San Diego, 2014b, pp. 5.3-24 and 5.3-25)

With respect to diesel particulate matter (DPM), the OMCPU Final PEIR found that acute health risks due to DPM would be less than significant. For long-term carcinogenic risks associated with DPM, the Maximally Exposed Individual Resident (MEIR) average residential incremental cancer risk due to diesel particulates from mobile sources was found to be 2.8 in one million; the 80th percentile residential incremental risk was calculated at 3.1 in one million; and the high-end residential

incremental risk was determined to be 4.0 in one million. At the Point of Maximum Impact (PMI) for the Maximally Exposed Individual Worker (MEIW), the worker incremental cancer risk due to diesel particulates was calculated at 0.57 in one million. This is below the ten in one million threshold commonly applied by agencies in California. For non-carcinogenic risks, the OMCPU Final PEIR found that the maximum chronic hazard index at any of the modeled receivers is 0.19, which is below the significance threshold of 1.0. As such, the OMCPU Final PEIR found that DPM impacts affecting sensitive receptors would be less than significant. (City of San Diego, 2014b, pp. 5.3-25 and 5.3-26)

The OMCPU Final PEIR also evaluated potential impacts to sensitive receptors from stationary sources. The EIR found that the OMCPU would allow for the establishment of new businesses that have the potential to emit toxic air contaminants (TACs), and imposed a mitigation measure (OMCPU Final PEIR Mitigation Framework AQ-3) to require compliance with Assembly Bill (AB) 2588 prior to the establishment any new source of TACs within the OMCPU area. Nonetheless, the OMCPU Final PEIR concluded that these impacts would be significant and unavoidable. (City of San Diego, 2014b, pp. 5.3-26 and 5.3-29)

Potential impacts due to collocation also were evaluated in the OMCPU Final PEIR because the OMCPU would allow residential, commercial, and industrial uses in close proximity to one another. Air quality impacts discussed in the OMCPU Final PEIR include DPM emitted by heavy trucks and diesel engines, chromium emitted by chrome platers, and perchloroethylene emitted by dry cleaning operations. The OMCPU Final PEIR noted that the OMCPU contains policies and performance standards to avoid and/or reduce potential impacts associated with collocation of diverse land uses. While compliance with the OMCPU and General Plan policies, along with local, state, and federal regulations were found to reduce potential impacts, the OMCPU Final PEIR concluded that future projects may result in significant impacts due to the introduction of sensitive uses (residential uses, schools, parks) within the buffer distances of the facilities. Although Mitigation Framework AQ-4 would be implemented with future developments in the OMCPU, collocation impacts were identified as significant and unavoidable because it could not be determined in the absence of a detailed evaluation of future implementing development projects whether the proposed mitigation would reduce all impacts to below a level of significance. (City of San Diego, 2014b, pp. 5.3-29, 5.3-31, and 5.3-32) A statement of overriding considerations was adopted for this impact.

The OMCPU Final PEIR found that at the time the OMCPU Final PEIR was certified, there were no known significant odor generators within or near the Project. The OMCPU Final PEIR found that none of the proposed OMCPU land uses are typically associated with the creation of objectionable odors. Therefore, the OMCPU Final PEIR concluded that impacts associated with odors would be less than significant. (City of San Diego, 2014b, p. 5.3-33)

Project

The San Diego Air Pollution Control District (SDAPCD) is the government agency that regulates sources of air pollution within San Diego County and developed a RAQS to provide control measures designed to achieve attainment status. The RAQS serves as the Air Quality Management Plan (AQMP) for the SDAB in which the Project site is located. As was the case when the OMCPU Final PEIR was certified in 2014, the SDAB is in "non-attainment" status for federal and State ozone (O_3) standards and the State PM_{10} and $PM_{2.5}$ standards; however, an attainment plan is only available for

O_3. The RAQS was adopted in 1992 and has been updated as recently as 2016 which was the latest update incorporating minor changes to the prior 2009 update. The 2016 RAQS update mostly clarified and enhanced emission reductions by updating the assessment of air quality improvement, updating recent and projected future emissions reduction rates, incorporating control measures adopted/control measures scheduled for review, updating incentive programs, updating transportation control measures, and reaffirmation of state emissions offset repeal. (SDAPCD, 2016, pp. EX-1, EX-2)

The RAQS is largely based on population predictions by the SANDAG. Projects that produce less growth than predicted by SANDAG would generally conform to the RAQS and projects that create more growth than projected by SANDAG may create a significant impact. Also, an individual project would be considered to have a cumulatively-considerable impact if the project results in emissions that exceed the screening thresholds after the implementation of all feasible mitigation measures.

The OMCPU Final PEIR and Addendum No. 408329 determined that implementation of the OMCPU as modified by the CVSP, including the Project and future development on the Project site, would result in emissions in excess of the significance threshold for criteria air pollutants and precursors for which the region is in non-attainment, and would not be consistent with the AQMP assumptions. The OMCPU Final PEIR and Addendum No. 408329 determined that impacts would be significant and unavoidable due to a conflict with the AQMP. The Project and future development on the Project site would result in the same number of peak hour trips assumed for the Project site by Addendum No. 408329 and would result in fewer peak hour trips as compared to the number of trips assumed for the Project site by the OMCPU Final PEIR. Accordingly, the Project's impacts and impacts related to future development on-site would be fully within the scope of impacts identified in the OMCPU Final PEIR and Addendum No. 408329; therefore, impacts due to a conflict with the AQMP under the Project would be consistent with the impacts identified in the OMCPU Final PEIR and Addendum No. 408329, and the Project's significant and unavoidable impact would not increase beyond that disclosed by the OMCPU Final PEIR. The OMCPU Final PEIR identified mitigation measures to reduce air quality-related impacts, and several of these mitigation measures would apply to the Project to reduce air quality emissions. The Project would contribute to, but would not increase the significant unavoidable impact disclosed by the OMCPU Final PEIR due to a conflict with the AQMP; thus, the Project's impacts are within the scope of analysis of the OMCPU Final PEIR.

The SDAPCD has developed localized significance thresholds for regulated pollutants. Any projects in the SDAPCD with daily emissions that exceed any of the indicated thresholds would be considered as having an individually and cumulatively-considerable significant air quality impact. Air quality emissions would occur during both construction and operation of the Project. The Project's potential to exceed the SDAPCD regional and/or localized emissions thresholds and potential to result in a cumulatively-considerable net increase in criteria pollutants for which the region is in non-attainment during both Project construction and long-term operation are discussed below.

Construction Impacts

Air quality emissions would result from construction activities needed to implement the Project. Because the development area (4.98 acres) assumed by the OMCPU Final PEIR and Addendum and development area (4.98 acres) proposed by the Project are substantially similar, it is assumed that

construction activities associated with buildout of the Project would be consistent with the assumptions made in the OMCPU Final PEIR and Addendum No.408329 for the Project site.

The OMCPU Final PEIR and Addendum No. 408329 determined that construction activities associated with individual developments within the OMCPU area likely would be below the SDAPCD's regional significance thresholds. However, the OMCPU determined that if multiple developments were to be under construction simultaneously, then short-term emissions of air pollutants and ozone precursors would have the potential exceed SDAPCD's regional significance thresholds, thereby resulting in a significant impact. Consistent with the finding of the OMCPU Final PEIR, the Project's construction-related emissions and construction-related emissions associated with future development on-site likely would be below the SDAPCD's regional significance thresholds; however, there is a potential for Project and future on-site development construction activities to occur at the same time as other developments within the OMCPU area. As such, Project and future on-site development construction activities would contribute to the significant and unavoidable impacts associated with construction-related emissions as identified in the OMCPU Final PEIR and Addendum No. 408329, and impacts would be potentially significant.

The OMCPU Final PEIR identified regulations and mitigation measures to reduce air quality-related impacts, and the applicable regulations and mitigation measures from the OMCPU Final PEIR would apply to the Project to reduce the Project's construction-related air quality emissions. The Project would implement Mitigation Measure MM-1, as detailed in the MMRP, to reduce impacts related to construction-related air quality emissions. This mitigation measure would be consistent with OMCPU Final PEIR Mitigation Framework Measure AQ-1. Furthermore, future development on-site would be required to comply with OMCPU Final PEIR Mitigation Framework AQ-1.

Nonetheless, and consistent with the finding of the OMCPU Final PEIR and Addendum No. 408329, because it cannot be assured that Project construction activities would not overlap with construction activities associated with other developments, Project construction activities would contribute to the significant and unavoidable impacts identified by the OMCPU Final PEIR due to a violation of an air quality standard and due to a cumulatively-considerable net increase in criteria pollutants, even after the implementation of the mitigation measures identified by the OMCPU Final PEIR. However, the Project's impacts would be fully within the scope of the impacts identified in OMCPU Final PEIR and Addendum No. 408329. Furthermore, due to emissions regulations becoming more stringent and typical turnover of older pieces of construction equipment (older pieces of equipment being replaced with newer and less polluting pieces of equipment over time), Project construction air quality emissions may be reduced in comparison to what was evaluated and disclosed by the OMCPU Final PEIR. Therefore, Project's impacts would be fully within the scope of impacts identified in the OMCPU Final PEIR, and the level of impact (significant and unavoidable impact) associated with OMCPU buildout, including the Project, would not increase beyond what was cited in the OMCPU Final PEIR.

Operational Emissions

Air emissions from daily operations would include sources such as Area, Energy, and Mobile. Area Source emissions include emissions from consumer products, landscaping maintenance equipment, and architectural coatings (such as painting) as part of regular maintenance activities in a predominately residential community. Energy sources emissions would be generated from the

production and consumption of energy to operate the community, such as electricity and natural gas. Mobile (or transportation-related) source emissions would occur from motor vehicles (tailpipe emissions) generated by land uses in the Project area.

Future development on the Project site would be developed in accordance with the CVSP's policies and design standards, and consistent with the CVSP would be developed with fewer residential units as compared to what was evaluated by the OMCPU Final PEIR for the Project site. Thus, Area Source and Energy Source emissions would be similar to what was evaluated in the OMCPU Final PEIR. Additionally, due to the reduction in the number of dwelling units, future development on the Project site would generate less traffic as compared to what was assumed for the Project site by the OMCPU Final PEIR. Thus, Mobile Source emissions would be less than was disclosed by the OMCPU Final PEIR.

The OMCPU Final PEIR determined that buildout of the OMCPU, including the Project, would result in emissions that exceed SDAPCD's regional significance thresholds for ROG, NO_X, CO, PM_{10}, and $PM_{2.5}$. Due to the reduction in the amount of traffic that would be generated by future development on the Project site as compared to what was assumed by the OMCPU for the site, future development on-site would result in fewer emissions of these pollutants. Nonetheless, and consistent with the findings of the OMCPU Final PEIR and Addendum No. 408329, future development on the Project site would contribute to the significant and unavoidable air quality impact and Project impacts would be significant. The OMCPU Final PEIR identified regulations and mitigation measures to reduce air quality-related impacts and applicable regulations, and mitigation measures from the OMCPU Final PEIR would apply. Future development on-site would be required to comply with OMCPU Final PEIR Mitigation Framework AQ-2. Notwithstanding, and consistent with the finding of the OMCPU Final PEIR and Addendum No. 408329, impacts due to a violation of an air quality standard and impacts due to a cumulatively-considerable net increase in criteria pollutants as a result of OMCPU buildout (including the Project and future development on the Project site) would remain significant and unavoidable even after the implementation of mitigation measures. Impacts would be fully within the scope of impacts identified in the OMCPU Final PEIR, and the level of impact (significant and unavoidable impact) would not increase with the implementation of the Project beyond that cited in the OMCPU Final PEIR and subsequent Addendum.

Provided below is a discussion of potential impacts associated with CO "Hot Spots," DPM-related health risks, and TAC risks associated with the collocation of residential and industrial uses.

CO "Hot Spots"

Traffic that would be generated by future development on the Project site would be less than was assumed for the site by the OMCPU Final PEIR. As such, future development on the Project site would not increase the potential for CO "Hot Spots" within the OMCPU area. Because the OMCPU Final PEIR determined that buildout of the OMCPU would not result in any CO "Hot Spots," and because future development on the Project site would generate less traffic than was accounted for by the OMCPU Final PEIR, impacts due to CO "Hot Spots" would be less than significant and would be reduced in comparison to what was assumed by the OMCPU Final PEIR.

DPM-Related Health Risks

In accordance with OMCPU Final PEIR Mitigation Framework AQ-4, a site-specific health risk assessment (HRA) was conducted as part of the Air Quality Assessment prepared for Addendum No. 408329 to evaluate potential health risks to future project residents associated with DPM emissions. Based on the modeling results that show impacts from vehicle exhaust along heavily traveled roadways, the HRA found that future development on the Project site would not attract substantial numbers of heavy diesel trucks and therefore would not contribute to an increase in health risks in the OMCPU area beyond what was disclosed in the OMCPU Final PEIR.

Future development would be required to comply with the Design Standards contained in the CVSP, which would be assured as part of the City's future review of the required NDP. CVSP Design Standard 2.2-11 requires installation of mechanical quality filtration systems for residential units in Planning Area 8 (the Project site is located within CVSP Planning Area 8). Consistent with the findings of Addendum No. 408329, mandatory compliance with CVSP Design Standard 2.2-11 would reduce to below a level of significance potential DPM impacts affecting future Project residents. (T&B Planning, 2017)

Toxic Air Contaminants and Collocation

As disclosed in the HRA prepared for Addendum No. 408329, the Project site would be located in close proximity to off-site light and heavy industrial uses to the south and southeast. As concluded by the OMCPU Final PEIR and Addendum No. 408329, the collocation of residential and industrial uses would have the potential to result in air pollution-related health effects to sensitive receptors. The OMCPU Final PEIR concluded that the potential exposure of sensitive receptors to air toxics would be significant and unavoidable. The Project would have no effect on the location, composition, or operational characteristics of existing or future off-site industrial uses, and the residential uses associated with future development of the Project site are consistent with those identified in the OMCPU and CVSP. Furthermore, and as noted above, future development on-site would be subject to CVSP Design Standard 2.5-54, requiring the installation of mechanical air filtration systems for all residential units within CVSP Planning Area 8 that are within 500 feet of the eastern and southern boundaries of the CVSP. Additionally, CVSP Policy 2.5-44 would apply, which includes design strategies to address issues associated with the collocation of industrial and residential uses, such as minimizing the number of doors and windows facing industrial uses (T&B Planning, 2017). Moreover, it should be noted that all off-site sources which have the ability to generate toxic air contaminants from operations are required to work with the SDAPCD and report emissions and obtain permits to operate. These requirements are independent of the Project. Therefore, impacts caused by existing and future off-site industrial activities or operations would be less than significant.

Based on the preceding analysis, and assuming compliance with the policies and design standards of the CVSP, the Project would not expose sensitive receptors to substantial pollutant concentrations, including air toxics such as diesel particulates, and impacts would be less than significant.

Odors

Under existing conditions, no known significant odor generators are located within or near the Project site. Odor impacts would not significantly change under the Project or future development on-site, and the development area and land uses would be in accordance with the CVSP, which were similar to the uses assumed by the OMCPU Final PEIR for the site. The land uses that would occur on the Project site with future development do not include any substantial odor generating uses.

Consistent with the conclusion reached in the OMCPU Final PEIR, the Project and future development on-site would produce odors during proposed construction activities, including odors from construction equipment exhaust, application of asphalt, and/or the application of architectural coatings. However, standard construction practices would minimize the odor emissions and their associated impacts. Any odors emitted during construction would be temporary, short-term, and intermittent in nature, and would cease upon the completion of the respective phase of construction. In addition, construction activities on the Project site would be required to comply with SDAPCD Rule 51 (Public Nuisance) and California Health & Safety Code, Division 26, Part 4, Chapter 3, Section § 41700, which prohibit the emission of any material which causes nuisance to a considerable number of persons or endangers the comfort, health or safety of the public, including odors. Accordingly, the Project would not create objectionable odors affecting a substantial number of people during construction.

Future development on-site would include residential land uses, which are not typically associated with objectionable odors. The temporary storage of refuse associated with future development's long-term operational use could be a potential source of odor. Refuse would be stored in covered containers and removed at regular intervals in compliance with the City's solid waste regulations, thereby precluding any significant odor impact. Also, future development projects would be required to comply with SDAPCD Rule 51 (Public Nuisance) and California Health & Safety Code, Division 26, Part 4, Chapter 3, Section § 41700. SDAPCD Rule 51 and Section 41700 prohibit the emission of any material which causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of the public, including odors. As such, future development associated with long-term operation would not create objectionable odors affecting a substantial number of people and the Project would have a less-than-significant impact. Based on the above analysis and consistent with the conclusion reached in the OMCPU Final PEIR, buildout of the Project would result in less-than-significant impacts due to odors.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCPU Final PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR result.

BIOLOGICAL RESOURCES

OMCPU Final PEIR

The OMCPU Final PEIR found that implementation of the OMCPU would have the potential to directly impact sensitive plants and animals through the loss of habitat or indirectly by locating development adjacent to the MHPA. Affected sensitive species include: coastal California gnatcatcher, Quino checkerspot butterfly, San Diego fairy shrimp, Riverside fairy shrimp, San Diego

horned lizard, Belding's orange-throated whiptail, western burrowing owl, coastal cactus wren, northern harrier, Cooper's hawk, golden eagle, least Bell's vireo, and southern California rufous-crowned sparrow. As such, the OMCPU Final PEIR found that these potential impacts to protected species of plants or animals would be significant. The OMCPU Final PEIR identified Mitigation Framework BIO-1 to reduce significant impacts to below a level of significance. Mitigation Framework BIO-1 requires the preparation of site-specific biological resources surveys before implementing development projects are approved in accordance with the City of San Diego Biology Guidelines and mitigation for impacts to sensitive upland habitats to occur in accordance with the MSCP mitigation ratios specified within the City's Biology Guidelines (City of San Diego, 2012). In addition, the OMCPU Final PEIR found that potentially significant construction-related noise impacts to sensitive animals would be reduced with implementation of Mitigation Frameworks LU-2 and BIO-2. The OMCPU Final PEIR concluded that with implementation of Mitigation Frameworks BIO-1, BIO-2, and LU-2, potentially significant impacts to sensitive plant and animal species would be reduced to below a level of significance. (City of San Diego, 2014b, pp. 5.4-43 through 5.4-61)

The OMCPU Final PEIR found that future development associated with the implementation of the OMCPU, including the construction of roadways and utility lines within the MHPA, would have the potential to interfere with the nesting, foraging, and movement of migratory wildlife, which would result in a significant impact. The OMCPU Final PEIR identified Mitigation Framework BIO-2, which requires identification of site-specific mitigation for future development projects in accordance with the City's Biology Guidelines during the discretionary review process. The OMCPU Final PEIR concluded that with compliance to applicable OMCPU policies and development standards and regulations including the City's ESL Ordinance and MSCP and with implementation of Mitigation Framework BIO-2, impacts to migratory wildlife would be reduced to below a level of significance. (City of San Diego, 2014b, pp. 5.4-62 and 5.4-63)

The OMCPU Final PEIR found that the OMCPU would result in significant impacts to Tier I, II, IIIA, and IIIB habitats, which include maritime succulent scrub, native grassland, Diegan coastal sage scrub, southern mixed chaparral, non-native grassland, riparian scrub, vernal pools, and basins with fairy shrimp. The OMCPU Final PEIR anticipated impacts to 211.6 acres of vegetation communities/land cover types within the CVSP area. The OMCPU Final PEIR concluded that compliance with OMCPU policies and development regulations and standards and implementation of Mitigation Framework BIO-1, requiring site specific-biological resources studies to be conducted for implementing development projects in accordance with the City's Biology Guidelines and mitigation for impacts to sensitive upland habitats to be in accordance with the MSCP mitigation ratios specified within the City's Biology Guidelines, impacts would be reduced to below a level of significance. (City of San Diego, 2014b, pp. 5.4-64 and 5.4-65)

The OMCPU Final PEIR found that implementation of the OMCPU would be consistent with the MSCP, but acknowledged that the OMCPU would introduce land uses adjacent to the MHPA, which would result in a potentially-significant impact at the program-level. The OMCPU Final PEIR found that future development in the OMCPU area may require adjustment(s) to the MHPA boundary; however, potential impacts to the MHPA preserve configuration as a result of MHPA boundary adjustments were found to be less than significant because any such adjustment must meet the required MHPA boundary line equivalency criteria and would be subject to approval from the USFWS and California Department of Fish and Wildlife (CDFW). Additionally, the OMCPU Final PEIR found that potential indirect impacts would be evaluated at the project-level for consistency with the

MHPA Land Use Adjacency Guidelines. The OMCPU Final PEIR found that although implementation of the OMCPU would introduce land uses adjacent to MHPA which would potentially result in a significant impact, compliance with established development standards and other applicable regulations of the City's Municipal Code as well as the MSCP Subarea Plan's Land Use Adjacency Guidelines, MSCP Management Policies and Directives, and Area Specific Management Directives were found to reduce impacts to below a level of significance. Additionally, impacts due to a conflict with the MHPA Land Use Adjacency Guidelines were determined to be less than significant with implementation of Mitigation Framework LU-2. (City of San Diego, 2014b, pp. 5.1-58 through 5.1-64)

The OMCPU Final PEIR found that the OMCPU would have the potential to introduce invasive species into the MHPA due to the large extent of future grading and development anticipated within the OMCPU area. The OMCPU Final PEIR concluded that assuming compliance with MHPA Land Use Adjacency Guidelines and implementation of mitigation framework LU-2, which requires a project's landscape plan to contain a mix of native species to be located adjacent to MHPA and prohibits the use of exotic plants and invasive species, impacts would be reduced to a level below significance.

The OMCPU Final PEIR found that future development projects implemented in accordance with the OMCPU would result in significant impacts to federally-protected wetlands and other jurisdictional water resources, including riparian habitat; vernal pools and vernal pool species; and basins with sensitive species of fairy shrimp. The OMCPU Final PEIR identified Mitigation Framework BIO-4 to reduce impacts, which requires compliance with federal wetland permitting requirements. Mitigation Framework BIO-4 also requires site-specific biological resources surveys to be conducted in association with implementing development projects in accordance with the City's Biology Guidelines, and mitigation for impacts to wetlands to be implemented in accordance with MSCP mitigation ratios specified in the City's Biology Guidelines. The OMCPU Final PEIR concluded that compliance with OMCPU policies, established development standards, ESL Regulations, MSCP Subarea Plan, the City's Biology Guidelines, and implementation of Mitigation Framework BIO-4, impacts would reduce impacts to wetlands, vernal pools, and other jurisdictional water resources to a level below significance at the program level. (City of San Diego, 2014b, pp. 4.5-69 and 5.4-70)

The OMCPU Final PEIR found that the OMCPU would have the potential to result in significant temporary and/or noise impacts to sensitive species within the MHPA. The OMCPU Final PEIR concluded that compliance with applicable policies of the City's General Plan and OMCPU, ESL Regulations, MHPA Land Use Adjacency Guidelines, and the City's Biology Guidelines, as well as implementation of mitigation frameworks BIO-1 through BIO 4 and LU-2, noise-related impacts to sensitive species within the MHPA would be reduced to below a level of significance.

Project

Consistent with the OMCPU Final PEIR mitigation framework, a site-specific Biological Resources Report (BRR) (*Appendix B*) was prepared. According the to the BRR, the Project would not have the potential to impact sensitive species. The Project's impacts to sensitive species are detailed below.

The OMCPU Final PEIR concluded that implementation of the OMCPU land use plan would have the potential to directly impact sensitive plants. The OMCPU Final PEIR assumed potential impacts to 23 different sensitive plant species, of which mapping indicated the potential presence of San Diego barrel cactus and San Diego County sunflower in the Project area.

As stated in the OMCPU Final PEIR, however, "due to the fact that portions of the biological resource assessment [used for the OMCPU Final PEIR] are based on secondary source information rather than site-specific field surveys, the impacts [disclosed in the OMCPU Final PEIR] would be refined for individual projects." As anticipated by this statement in the OMCPU Final PEIR, and based on more recent field survey work the Project site and off-site impact area contain one vegetation community and one land cover type: disturbed land and urban/developed. Disturbed land includes land cleared of vegetation, land containing a preponderance of non-native plant species, or land showing signs of past or present usage that no longer provides viable wildlife habitat. Disturbed habitat is considered Tier IV (other uplands) by the City and not sensitive. Urban/developed land is where permanent structures and/or pavement have been places, which prevents the growth of vegetation, or where land scaping is clearly tended and maintained. Urban/developed land is not considered sensitive (Alden, 2020, p. 7).

No special status plant species were found to occur on-site or in the off-site impact area. Additionally, special status plant species do not have the potential to occur due to the site's level of disturbance and development. Accordingly, the Project does not have the potential to impact special status plant species and the Project would have a less-than-significant impact. (Alden, 2020, p. 7)

The OMCPU Final PEIR concluded that implementation of the OMCPU land use plan would have the potential to directly impact sensitive animals. The OMCPU Final PEIR assumed potential impacts to 23 different sensitive animal species. As stated in the OMCPU Final PEIR, however, "due to the fact that portions of the biological resource assessment [used for the OMCPU Final PEIR] are based on secondary source information rather than site specific field surveys, the impacts [disclosed in the OMCPU Final PEIR] would be refined for individual projects." As anticipated by this statement in the OMCPU Final PEIR, and based on more recent field survey work, no sensitive animal species were found on the Project site during field survey. Additionally, no special status animal species have the potential to occur on-site due to the site's level of disturbance and development (Alden, 2020, p. 8).

Moreover, according to the BRR, the Project site did not contain burrowing owls, evidence of owl presence, or potential owl burrows during the burrowing owl survey conducted for the Lumina Tentative Tract Map Project, which included the Project site. The burrowing owl survey report states that that the Project site lacks suitable burrow and evidence of occupation and is not considered occupied by the burrowing owl (Alden, 2020, p. 8). Based on the foregoing, the Project does not have the potential to impact special status animal species and impacts would be less than significant.

The Project has the potential to indirectly impact active bird nests if vegetation is removed during the nesting season (generally February 1 to September 15). Impacts to nesting birds are prohibited by the MBTA and California Fish and Game Code. The MBTA and California Fish and Game Code provides legal protection for almost all breeding bird species occurring in the United States, including raptors. The Project would be required to comply with the MBTA and California Fish and Game Code to avoid/minimize impacts to nesting birds, as required by Project-specific Mitigation Measure MM-2. Consistent with the findings of OMCPU Final PEIR, impacts to nesting birds protected by the MBTA would be less than significant. (Alden, 2020, p. 9)

The Project's impacts to sensitive species as discussed above would be consistent with the findings of the OMPCU EIR and Addendum No. 408329 thereto. Impacts to biological resources that would occur as a result of the Project were disclosed in the OMCPU Final PEIR, and mitigated to less than significant levels. The Project's BRR concluded that implementation of the Project would not result in impacts to special status plant species, special status animal species, or nesting birds. The Project would incorporate MM-2 to ensure impacts to nesting birds are reduced to below a level of significance.

According to the OMCPU Final PEIR, the canyon areas within the OMCPU area serve as wildlife corridors that for a network extending to the Otay River Valley. As previously discussed, the Project site is disturbed and developed and, as such, does not have the potential to contain suitable habitat for native wildlife species. Additionally, the Project site is not in an area that supports the movement of migratory wildlife species. The Project site does not contain any canyons or water features that would aid in the nesting/foraging/movement of any resident or migratory fish or wildlife species. The Project site is not located in proximity to MHPA lands. The nearest MHPA land to the Project site is located approximately 0.1-mile southwest (Google Earth, 2020). Implementation of the Project would not have the potential to interfere with the nesting/foraging/movement of any resident or migratory fish or wildlife species. The impacts that would be caused by the Project are within the scope of the OMCPU Final PEIR, and all impacts due to interfering with the nesting/foraging /movement of any resident or migratory fish or wildlife species would be less than significant.

The OMCPU Final PEIR reported six vegetation communities/land cover types are located in the Project area in the OMCPU Final PEIR. The Addendum No. 408329 to the OMCPU Final PEIR for the CVSP project confirmed that each of these identified communities was still present in the on the CVSP area, although the extent of their current coverage is different that was disclosed in the OMCPU Final PEIR. In addition, Addendum No. 408329 to the OMCPU Final PEIR indicated that that one additional vegetation community was present within the CVSP area (i.e., non-native vegetation). The difference in vegetation communities reported between the OMCPU Final PEIR and the Addendum No. 408329 to the OMCPU Final PEIR was the result of more refined mapping done for the CVSP project and/or changes in the actual field conditions. The Project's BRR identified one vegetation community, disturbed land, present on the Project site; disturbed land (Tier IV) is not considered sensitive (Alden, 2020, p. 7).

Consistent with finding of the OMCPU Final PEIR and Addendum No. 408329 to the OMCPU Final PEIR, there is no riparian habitat located within the Project site. The Project would result in impacts to 4.98 acres of habitat on-site and 0.25 acre of habitat off-site. Table 2, *Direct Impacts to Vegetation Communities/Land Cover Types,* shows the Project's impacts to vegetation communities/land cover types. The Project's impacts to disturbed land (Tier IV) and urban/developed land would be less than significant as the impacts would not meet criteria for significance and no mitigation would be required. Accordingly, and consistent with the findings of the OMCPU Final PEIR, the Project would have a less-than-significant impact due to a conflict with sensitive habitats.

Implementation of the Project would result in development on-site that is substantially consistent with the OMCPU and CVSP. The Project site is not located within proximity to any MHPA lands; the nearest MHPA land to the Project site is located approximately 0.1-mile southwest. The implementation of the Project is not anticipated to affect the long-term conservation of biological

Table 2 Direct Impacts to Vegetation Communities/Land Cover Types

Vegetation Community/ Land Cover Type	Total Acreage Impacted On-site	Total Acreage Impacted Off-Site	Total Impacted Acreage
Disturbed Land (Tier IV)	3.95	0.00	3.95
Urban/Developed (Tier IV)	1.03	0.25	1.28
TOTAL	**4.98**	**0.25**	**5.23**

(Alden, 2020, Table 3)

resources. Additionally, because the Project site is not located in proximity to any MHPA lands, the MSCP Subarea Plan's Land Use Adjacency Guidelines do not apply to the Project. Thus, the Project does not have the potential to interfere with the City's ability to meet the objectives of the MSCP Subarea Plan, or conflict with other approved local, regional, or state conservation plans. Implementation of the Project would result in no impacts.

The Project would be developed in accordance with the CVSP. The CVSP includes a "Village-Wide Plant Palette" and a mandatory Design Standard which prohibits the use of invasive plant species within the CVSP area (including the Project site). CVSP Design Standard 2.5-2 states "Prohibited and invasive plant species shall not be knowingly used within Central Village. Prohibited plants are those which do not satisfy the minimum performance standards for the site area per the City's Municipal Code Chapter 14, Article 2, Division 4, Landscape Regulations." (T&B Planning, 2017). Additionally, the landscape plans for the Project were reviewed by a qualified biologist to confirm that they do not include any invasive species. Furthermore, the Project site is not in proximity to any MHPA lands. Therefore, the implementation of the Project would result in less than significant impacts related to the introduction of invasive species.

Alden assessed the Project site for features that could be considered jurisdictional by the Corps, CDFW and RWQCB, and no such features were found on-site. Given the lack of potential jurisdictional features on-site, no impacts would occur.

The Project site is not within proximity to any MHPA lands and lacks connectivity to such lands. Therefore, the Project's temporary construction noise and long-term operational noise levels are not anticipated to adversely impact sensitive species within the MHPA. As such, impacts due to construction and operational noise that could adversely impact sensitive species within the MHPA would be less than significant.

The Project would implement Mitigation Measure MM-2, as detailed in the MMRP, to reduce impacts related to biological resources to a less than significant level. This mitigation measure would be consistent with OMCPU Final PEIR Mitigation Framework Measures BIO-1 and BIO-2.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the PEIR occur.

HISTORICAL RESOURCES

OMCPU Final PEIR

The OMCPU Final PEIR found that impacts to prehistoric and historical resources would include substantial adverse aesthetic impacts as well as adverse physical alteration, relocation, or demolition of prehistoric and historic buildings, structures, objects, landscapes, and sites. The OMCPU Final PEIR also determined that impacts from future development also could occur at the project-level. The OMCPU Final PEIR identified Mitigation Frameworks HIST-1 and HIST-2 to reduce potential aesthetic and physical impacts to prehistoric and historic resources. Mitigation Framework HIST-1 would require the preparation of a site-specific archaeological study and implementation of appropriate mitigation to be conducted prior to the issuance of any permit for a future development project that could potentially affect a prehistoric or historical resource. Mitigation Framework HIST-2 would require the City to determine whether the affected building or structure is historically significant per the Historical Resources Guidelines prior to the issuance of any permit for a future development project that would directly or indirectly affect a building or structure that is more than 45 years of age. The OMCPU Final PEIR concluded that implementation of Mitigation Frameworks HIST-1 and HIST-2 would reduce potentially significant impacts associated with aesthetic and physical alteration or destruction of prehistoric and historic resources to below a level of significance. (City of San Diego, 2014b, pp. 5.5-21 through 5.5-28)

The OMCPU Final PEIR found that construction of future projects associated with the implementation of the OMCPU would result in significant impacts to religious or sacred uses. The OMCPU Final PEIR concluded that with implementation of mitigation framework HIST-1, impacts to religious or sacred sites would be reduced to below a level of significance.

The OMCPU Final PEIR found that ground-disturbing activities of future implementing development projects associated with the OMCPU could result in significant impacts to human remains that may be buried beneath the surface. The OMCPU Final PEIR concluded that with implementation of Mitigation Framework HIST-1, impacts to human remains would be reduced to below a level of significance.

Project

A site-specific Cultural Resources Study (*Appendix C1*) and a site-specific Historic Resources Supplemental Information Package (*Appendix C2*) were prepared for the Project site by Brian F. Smith and Associates (BFSA), the results of which are discussed below.

In 2018, BFSA conducted an updated survey of the parcels abutting the Project area of potential effects (APE). The results of that survey found that the abutting parcels contains six isolated prehistoric artifacts, five loci of Site SDI-10,963, one new archeological site (SDI-22,261), and previously recorded site SDI-14,094. Although these resources were identified within proximity to the Project site, none of the prehistoric resources were located near the boundaries of or appeared to extend into the Project site. However, given the location of the Project APE, the Project area is considered highly sensitive for potentially buried prehistoric cultural resources. (BFSA, 2019a, p. 11)

The previously recorded resources located near the Project site, including SDI-14,094 and SDI-10,963 were identified, tested, and evaluated for significance under the 2018 BFSA Cultural Resources Study. Furthermore, a previously unidentified historic trash deposit within Site SDI-10,963 Locus 1 and one new resource location (SDI-22,261) were tested and evaluated. Due to a lack of unique elements, limited research potential, and based on the criteria listed in CEQA Guidelines § 15064.5, BFSA concluded that each of these sites do not comprise significant prehistoric archeological resources. Although identified within the proximity of the current Lumina II Project, none of the cultural resources investigated during by BFSA were located near the boundaries of or appeared to extend into the current Project parcel. Moreover, development of the Project site would include grading within the limits of the Project site boundaries and, as such, the Project's proposed grading activities would result in less-than-significant impacts to the prehistoric archaeological resources.

Although no known significant archaeological resource sites would be impacted by the Project, there is a possibility that archaeological resources may be present beneath the site's subsurface, and may be impacted by future ground-disturbing construction activities associated with the Project. Due to the potential to discover elements of the prehistoric use of the area within the Project boundaries, a potentially significant impact to subsurface prehistoric resources would occur. A site-specific mitigation monitoring program is included in Section VI. of this EIR Addendum as Mitigation Measure MM-3. Consistent with the findings in the OMCPU Final PEIR, implementation of the Project would reduce potentially significant impacts associated with aesthetic and physical alteration or destruction of subsurface prehistoric and historic resources to below a level of significance.

Under existing conditions, and consistent with the conditions that existed at the time the OMCPU Final PEIR was certified, the Project site is developed with a residential structure. The building on the Project site met the 45-year age threshold for historic structures. The building is located at 2380 Cactus Road, and consists of one single-family residence constructed in 1973, with an original address of 1120 Cactus Road. A Historic Resources Supplemental Information Package *(Appendix C2)* was prepared to evaluate the potential historic and/or architectural significance of the structure located at 2380 Cactus Road on the Project site. (BFSA, 2019b)

The structure associated with 2380 Cactus Road was evaluated for historic significance as defined by City of San Diego Historical Resources Board (HRB) eligibility criteria, National Register of Historic Places (NRHP) criteria, and California Register of Historical Resources (CRHR) criteria. BFSA found that the structure at 2380 Cactus Road had been altered since the buildings' date of construction and no longer retained original aspects of integrity. The single-family structure on-site was classified as belonging to the Ranch-style influences; however, the structure no longer retains its originally integrity and is not an exemplary reflection of any form of historical, archaeological, cultural, economic, political, aesthetic, landscape, or architectural development. In addition, no historically significant individuals could be associated with the property. BFSA determined the property would not be considered eligible for historic resource designation by the San Diego HRB, CRHR, or NRHP. Because the site is not considered eligible under City of San Diego HRB, CRHR, or NRHP criteria, development of the site associated with the Project would not significantly impact the history or the overall character of the surrounding neighborhood. Due to a lack of integrity or association with significant persons or events, and ineligibility for historic resource designation, BFSA concluded that the building at 2380 Cactus Road do not comprise a significant historical resource and impacts would be less than significant.

As indicated in the above analysis of prehistoric and historic resources, the Project would result in less-than-significant impacts due to the alteration or destruction of a prehistoric or historical archaeological site, and due to adverse physical or aesthetic effects on a prehistoric or historic building, structure, object, or site. Grading activities on-site would have the potential to impact subsurface prehistoric resources; however, with implementation of Mitigation Measure MM-3, impacts would be less than significant. Accordingly, and consistent with the findings of the OMCPU Final PEIR, implementation of the Project would result in a less-than-significant aesthetic and physical impacts to prehistoric and historic archeological resources.

The Project's Cultural Resources Study (*Appendix C1*) included a records search for existing religious or sacred uses on the Project site. The records search did not identify the presence of any sacred sites or locations of religious or ceremonial importance on the Project site or in the surrounding area. Although there are no known religious or sacred resources that occur on-site, ground-disturbing activities associated with the Project would have the potential to result in significant impacts to religious or sacred resources buried beneath the site's surface. Due to the potential to discover elements of religious or sacred uses within the Project boundaries during ground-disturbing activities, a potentially significant impact to subsurface religious and sacred resources would occur. Mitigation Measure MM-3 have been included herein in Section VI. of this EIR Addendum. Consistent with the findings in the OMCPU Final PEIR, implementation of Project-specific Mitigation Measure MM-3 would reduce potentially significant impacts to subsurface religious or sacred artifacts within the potential impact area to below a level of significance.

The Project site does not contain a cemetery and no known cemeteries are located within the immediate site vicinity. Field surveys conducted on the Project site by BFSA did not identify the presence of any human remains and no human remains are known to exist beneath the surface of the site. Although unlikely, ground disturbing activities associated with the Project could result in significant impacts to human remains, should any human remains exist beneath the site's surface. California State law addresses the treatment of human remains that may be discovered during a construction project. If human remains are encountered during future development of the site, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b), remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made by the Coroner. If the Coroner determines the remains to be Native American, the California Native American Heritage Commission (NAHC) must be contacted and the NAHC must then immediately notify the "most likely descendant(s)" of receiving notification of the discovery. The most likely descendant(s) shall then make recommendations within 48 hours, and engage in consultations concerning the treatment of the remains as provided in Public Resources Code Section 5097.98.

The Project would implement Mitigation Measure MM-3, as detailed in the MMRP, to reduce impacts related to archeological resources to a less than significant level. This mitigation measure would be consistent with OMCPU Final PEIR Mitigation Framework Measure HIST-1.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the PEIR occur.

HUMAN HEALTH/PUBLIC SAFETY/HAZARDOUS MATERIALS

OMCPU Final PEIR

The OMCPU Final PEIR found that future development projects that would implement the OMCPU would have the potential to result in significant impacts related to wildland fires. The OMCPU Final PEIR identified Mitigation Framework HAZ-1 to reduce impacts. Mitigation Framework HAZ-1 requires future projects to incorporate measures in accordance with the City's Brush Management Regulations and Landscape Standards intended to reduce the risk of wildfires. The OMCPU Final PEIR concluded that compliance with applicable policies of the 2010 Fire Code, LDC, and California Building Code and implementation of Mitigation Framework HAZ-1 would reduce impacts related to wildland fires to below a level of significance. (City of San Diego, 2014b, pp. 5.6-17 through 5.6-21)

The OMCPU Final PEIR found that future development projects associated with the OMCPU would have the potential to result in significant impacts related to airport operations at the Abelardo L. Rodriguez International Airport and Brown Field Municipal Airport. The OMCPU Final PEIR identified Mitigation Framework HAZ-2 to reduce impacts. Mitigation Framework HAZ-2 would require future development projects to obtain a Federal Aviation Administration (FAA) determination of "No Hazard to Air Navigation." The OMCPU Final PEIR concluded that compliance with applicable policies of the LDC, and California Building Code and implementation of Mitigation Framework HAZ-2, impacts related to airport operations would be reduced to below a level of significance. (City of San Diego, 2014b, pp. 5.6-18 through 5.6-21)

The OMCPU Final PEIR found that the OMCPU would site residential uses near existing industrial development or existing properties of environmental concern, as well as industrial and commercial land use designations that would allow certain business and industrial operations to generate, transport, or temporarily store hazardous waste within the vicinity of residential uses. Additionally, the OMCPU Final PEIR noted that trucks serving local businesses would expose residents to hazards associated with the release of hazardous materials (i.e., spillage; accidents, and explosions) that would be transported through the OMCPU area. However, the OMCPU Final PEIR concluded that the designation of truck routes within the OMCPU area with roadway improvements in conjunction with the circulation network would reduce the potential risk of exposure from hazardous materials to residents as a result of transporting hazardous materials. Additionally, the OMCPU Final PEIR noted that implementation of the policies contained in the General Plan, OMCPU, and regulations imposed by federal, state, and local agencies, including the U.S. Environmental Protection Agency (EPA), Resource Conservation and Recovery Act (RCRA), California Department of Health Services (DHS), County of San Diego Department of Environmental Health (DEH), and Caltrans would reduce potential impacts to below a level of significance. As such, the OMCPU Final PEIR concluded that impacts due to the exposure of people or the environment to a significant hazard through the release of hazardous substances or routine transport, use, or disposal of hazardous materials would be less than significant and no mitigation was required. (City of San Diego, 2014b, pp. 5.6-21 through 5.6-26)

The OMCPU Final PEIR found that the OMCPU area contained hazardous material sites pursuant to Government Code Section 65962.5 and that these sites, along with any unknown hazardous sites within the OMCPU area, would have potentially significant impacts on future development and land uses within the OMCPU area. The OMCPU Final PEIR identified Mitigation Framework HAZ-3 to

reduce impacts, which requires the preparation of a Phase I Site Assessment prior to the approval of implementing development and to require that all on-site contamination be avoided or remediated in compliance with local, state, and federal regulations. The OMCPU Final PEIR concluded that with compliance to General Plan and OMCPU policies and local, state, and federal regulations, and implementation of Mitigation Framework HAZ-3, potential impacts associated with hazardous sites would be reduced to below a level of significance. (City of San Diego, 2014b, pp. 5.6-26 through 5.6-28)

Project

The Project site is located approximately 0.3 mile east of a natural open space area. The Project site would be separated from the natural open space area by intervening development permitted under the CVSP. Given the Project's separation from natural open space areas, the Project would not be subject to significant wildfire hazards. Accordingly, and consistent with the findings of the OMCPU Final PEIR, impacts associated with wildfire hazards would be less than significant.

The Project site is located approximately 0.96 mile south of the Brown Field Municipal Airport (Google Earth, 2020). The Project site is located within the Airport Influence Area (AIA) for the Brown Field Municipal Airport and is subject to the Brown Field Municipal Airport Land Use Compatibility Plan (ALUCP), which was adopted in January 2010 (ALUC, 2010, Exhibit III-6). The Project site is identified by the ALUCP as being located in "Zone 6 – Traffic Pattern Zone" (ALUC, 2010, Exhibit III-2). Lands within Zone 6 are considered to have a "low" risk for impacts due to airport operations (ALUC, 2010, Appendix C, Table C-1). The Project would be developed in accordance with the land uses identified by the CVSP. The CVSP was submitted to the San Diego County Regional Airport Authority (SDCRAA), which serves as the Airport Land Use Commission (ALUC) for Brown Field, for a consistency determination with the ALUCP. A consistency determination was required to ensure that the land uses and development standards proposed by the CVSP were consistent with the ALUCP. The CVSP was determined to be consistent with the Brown Field Municipal Airport ALUCP by the ALUC on February 24, 2017 (ALUC, 2017). Thus, because the Project would be developed in accordance with the land uses in the CVSP, the Project would be consistent with the Brown Field Municipal Airport ALUCP. In addition, the Project would be subject to Design Standard 2.2-12 of the CVSP, which requires all developments to comply with the Airport Land Use Compatibility Overlay Zone of the San Diego Municipal Code, which implements the policies and criteria in the ALUCP applicable to Brown Field Municipal Airport (T&B Planning, 2017).

In addition, the Project would be required to obtain a FAA determination of "No Hazard to Air Navigation," which is required by Mitigation Measure MM-4. The Project would implement Mitigation Measure MM-4, as detailed in the MMRP, to reduce impacts related to airport hazards to a less than significant level. This mitigation measure would be consistent with OMCPU Final PEIR Mitigation Framework Measure HAZ-2. Furthermore, future development on-site would be required to comply with OMCPU Final PEIR Mitigation Framework HAZ-2.

Accordingly, because the CVSP and OMCPU are consistent with the ALUCP, and because the Project would be developed in accordance with the CVSP, impacts associated with aircraft hazards would be less than significant, consistent with the conclusion reached in the OMCPU Final PEIR.

A Phase I Environmental Site Assessment (Phase I ESA) was prepared for the Project site by C Young Associates (CYA), and is included as *Appendix D*. According to available historical resources, the Project site was first developed in 1971 with buildings located in the eastern portion of the property with corrals present along the northern boundary. The current residential use is visible beginning 1981 with additional outbuildings and an agriculture/nursery area. There is a potential for hazardous materials impacts due to proposed demolition and construction activities and during long-term Project operation. Each is discussed below.

The Project site does not contain any Recognized Environmental Conditions (REC) under existing conditions; however, the Project does contain environmental issues. An environmental issue refers to environmental concerns identified by CYA, which do not qualify as RECs but warrant further discussion. The environmental issues observed on the Project site included empty ASTs ranging in capacity from 500 to 1,000 gallons. No significant releases of hazardous wastes were observed or noted on the Project site. No staining or other suspect conditions were noted in the vicinity of the waste generation/storage/disposal hazardous wastes noted on the Project site. Accordingly, impacts associated with the above-listed waste generation/storage/disposal hazardous wastes would be less than significant, and these materials would be removed from the site in accordance with applicable regulations as part of the Project's demolition phase of construction. (CYA, 2018, p. 39)

Additionally, the Phase I ESA concluded that the Project site is not indicated within an area that has impacted soils, petroleum hydrocarbon stained soils, or soils with organochlorine pesticides (OCPs). Varying amounts of surficial miscellaneous trash and debris were observed throughout the Project site. The trash and debris observed were noted as non-hazardous solid wastes. These materials generally consisted of wood fragments, scrap metal, landscape waste, pipe fragments, abandoned appliances and furniture, automobile tires, concrete rubble, asphalt fragments and miscellaneous paper, plastic and glass products. Accordingly, impacts associated with the above-listed trash and debris would be less than significant, and these materials would be removed from the site in accordance with applicable regulations as part of the Project's demolition phase of construction. (CYA, 2018, p. 40)

Heavy equipment (e.g., dozers, excavators, tractors) would be operated on the Project site during the demolition and construction phases of the Project. This heavy equipment would likely be fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which is considered hazardous if improperly stored or handled. In addition, materials such as paints, adhesives, solvents, and other substances typically used in building construction would be located on the Project site during construction. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk on all construction sites, and there would be no greater risk for improper handling, transportation, or spills associated with the Project than would occur on any other similar construction site. Construction contractors would be required to comply with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited requirements imposed by the EPA, California Department of Toxic Substances Control (DTSC), SDAPCD, and San Diego Regional Water Quality Control Board (RWQCB). With mandatory compliance with applicable hazardous materials regulations, the Project would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase, and impacts would be less than significant.

Future development on-site would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Although the Project provides more specificity about the location and intensity of land uses on the Project site than did the OMCPU, the allowance of residential land uses to be developed in close proximity to existing and planned industrial uses that may utilize hazardous substances is the same. Therefore, consistent with the conclusion reached by the OMCPU Final PEIR, the Project and future development on-site would have the potential to expose people to hazards associated with hazardous materials. However, as discussed in the OMCPU Final PEIR, future site-specific discretionary actions would be required to comply with the General Plan and OMCPU policies and design guidelines that minimize collocation issues, which require site-specific analyses to address impacts associated with the collocation of residential uses in close proximity to industrial uses with hazardous or toxic substances to ensure that impacts would be less than significant (City of San Diego, 2014a, p. LU-19).

Additionally, trucks serving nearby industrial land uses would have the potential to expose future development residents to hazards associated with the release of hazardous materials. However, as discussed in the OMPCU EIR, improved roadway and transportation modifications pursuant to the OMCPU Mobility Element and the CVSP's Mobility Element would reduce the potential risk of exposure. Risks also would be reduced because Siempre Viva Road is identified by the OMCPU as a "Truck Activity Road," providing connections between industrial uses to the south of the Project site and "Truck Routes" located to the east; thus, the amount of truck traffic along Cactus Road adjacent to the Project site would be reduced. In addition, the Project site is within the CVSP and would be subject to compliance with the CVSP policies related to collocation which would ensure that future site-specific discretionary actions provide adequate buffers to separate uses from truck traffic and industrial uses located east of Cactus Road (see CVSP Policies 2.5-42 and 2.5-43) (T&B Planning, 2017). Future development on-site also would be subject to CVSP Design Standard 2.2-11, which requires the installation of mechanical air filtration systems within residential units in areas within 500 feet of the southern and eastern boundary of Planning Area 8, and would reduce potential impacts due to collocation of residential and industrial land uses to less-than-significant levels (T&B Planning, 2017). Furthermore, the Project's Phase I ESA did not identify any hazardous conditions related to surrounding land uses or activities. Accordingly, and consistent with the findings of the OMPCU EIR, a less-than-significant impact would occur.

As noted above, and with implementation of mandatory regulatory requirements and standard conditions of approval, the Project would result in less-than-significant impacts due to the routine transport, use, or disposal of hazardous materials, and less-than-significant impacts associated with reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

According to the Project's Phase I ESA, and consistent with the findings of the OMCPU Final PEIR, the Project site does not contain any RECs. As noted in Addendum No. 408329, the Martinez Ranch Compound (located at 2160 Cactus Road) and the Martinez Ranch Canyon Fill (located approximately 0.25 mile southwest of the Martinez Ranch Compound) are two hazardous sites that are located approximately 300 feet north of the Project site. As noted in Addendum No. 408329, areas in the vicinity of the Project site were found to contain various debris, impacted soils, and areas of hydrocarbon-stained soil However, the Project's Phase I ESA found that the referenced

impacted materials do not represent a significant risk to human health and the environment to the Project site. Impacts would be less than significant. (CYA, 2018, p. 42)

As noted above, the Project site does not contain hazardous materials sites pursuant to Governments Code Section 65962.5 which would have potentially significant impacts on future development and land uses on the Project site.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the PEIR occur.

HYDROLOGY AND WATER QUALITY

OMCPU Final PEIR

The OMCPU Final PEIR found that buildout of the OMCPU would result in an increase in impervious surfaces and associated increased runoff, and would result in substantial alterations to on- and off-site drainage; therefore, the OMCPU Final PEIR found that buildout of the OMCPU would result in potentially significant impacts associated with increased runoff which could result in substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes. The OMCPU Final PEIR identified Mitigation Framework HYD/WQ-1, which generally requires that the design and function of future projects do not impact downstream drainage patterns. Mitigation Framework HYD/WQ-2 also was identified, and requires that future projects be sited and designed to minimize impacts on receiving waters in order to reduce pollutants and mitigate impacts in accordance with the Stormwater Requirements. The OMCPU Final PEIR found with implementation of Mitigation Frameworks HYD/WQ-1 and HYD/WQ-2, impacts due to the creation of runoff water which would exceed stormwater drainage system capacity or provide substantial additional sources of polluted runoff would be less than significant.

The OMCPU Final PEIR disclosed that buildout in accordance with the OMCPU has the potential to result in a substantial change to stream flow velocities and drainage patterns on downstream properties within the Otay and Tijuana River Valley drainage basins. Therefore, implementation of the OMCPU was determined to have the potential to result in significant direct and indirect impacts to the natural drainage system. (City of San Diego, 2014b, p. 5.7-25) The OMCPU Final PEIR also found that buildout of the OMCPU would result in an increase in impervious surfaces and associated increased runoff, which could in turn result in increased risks of erosion hazards on- and off-site. (City of San Diego, 2014b, p. 5.7-26) The OMCPU Final PEIR identified Mitigation Framework HYD/WQ-2, which among other measures requires a reduction in impervious surfaces; avoidance of areas particularly susceptible to erosion and sediment loss; and compliance with the RWQCB and NPDES requirements. Additionally, the OMCPU Final PEIR noted that all future development within the OMCPU would be subject to the City's Storm Water Standards as well as applicable General Plan and OMCPU policies related to erosion hazards. Compliance with the required mitigation was found to reduce impacts to less-than-significant levels. (City of San Diego, 2014b, p. 5.7-30)

The OMCPU Final PEIR disclosed that there are only two areas in the OMCPU area subject to flooding conditions: the northwestern portion of the OMCPU area in the Otay River Valley; and the Otay Mesa Creek, which traverses the mesa in a north-south direction near La Media Road. The OMCPU Final

PEIR noted that future development along the floodplain would have the potential to increase flooding on- or off-site. All future projects located within the 100-year flood hazard area along Otay Creek, as identified in the OMCPU drainage study, were found to be subject to the OMCPU Community Plan Implementation Overlay Zone (CPIOZ), which would ensure discretionary review of all future development within these areas. Additionally, the OMCPU noted that Land Development Code § 143.0145 requires that any future development project must be studied to determine the effects to base flood elevations and ensure they would not result in flooding, erosion, or sedimentation impacts on or off-site. Also, the OMCPU Final PEIR concluded all future projects (both ministerial and discretionary) developed in accordance with the OMCPU would be required to be designed satisfactory to the City Engineer to contain the 100-year flow and reduce or eliminate flooding impacts to adjacent properties. Nonetheless, because project-level detail was unavailable at the program-level, the OMCPU Final PEIR concluded that projects under the OMCPU would have the potential to alter the course or flow of flood waters. To address this impact, the EIR imposed Mitigation Framework HYD/WQ-1, which includes specific requirements to preclude flood hazards within the OMCPU or downstream areas. The OMCPU Final PEIR concluded that compliance with Mitigation Framework HYD/WQ-1, the City's Storm Water Standards, and General Plan and OMCPU policies would reduce impacts to less-than-significant levels. (City of San Diego, 2014b, pp. 5.7-24 and 5.7-25)

The 2014 OMCPU Final PEIR found that future development within the OMCPU area could result in impacts to surface and ground water-quality, and could result in increases in pollutant discharges including downstream sedimentation. However, the OMCPU Final PEIR noted that water quality impacts would be reduced through the required implementation of Low Impact Development (LID) design, the implementation of storm water BMPs, and adherence to all other applicable federal, state, and local regulations. Because specific development proposals were not proposed or evaluated in the OMCPU Final PEIR, the EIR determined that it could not be guaranteed that all future program-level impacts would be avoided or mitigated to below a level of significance. Therefore, the OMCPU Final PEIR identified Mitigation Framework HYD/WQ-2 to reduce surface and ground water quality impacts and pollutant discharge impacts, and requires future projects to be sited and designed to minimize impacts on receiving waters and to mitigate impacts in accordance with the requirements of the City's Storm Water Runoff and Drainage Regulations (Chapter 14, Article 2, Division 2 of the LDC) and other appropriate agencies (e.g., RWQCB). The OMCPU Final PEIR noted that all future implementing projects would be required to fully meet the City of San Diego Storm Water Standards in effect at the time of approval. The OMCPU Final PEIR found with implementation of Mitigation Framework HYD/WQ-2, impacts due to discharges into surface or ground water or due to increases in pollutant discharges including downstream sedimentation would be less than significant.

Project

The Project conforms to the land use configurations and intensities identified in the Addendum prepared for the CVSP and generally conforms to the land use configurations and intensities identified in the OMCPU Final PEIR.

Future development associated with the Project would increase impervious surfaces in the Project area, which would lead to increased runoff that could exceed the capacity of existing or planned stormwater drainage systems and/or provide additional sources of polluted runoff. However, the

Project is required to design storm drain systems that comply with OMCPU and CVSP policies pertaining to the development of adequate storm drain facilities, including OMCPU Policies 6.3-1 through 6.3-5 and CVSP Design Standards 2.6-5 through 2.6-12, which require future projects to use sustainable infrastructure design to capture and control runoff, incorporate Best Management Practices (BMPs), improve drainage facilities in conjunction with development projects, implement the City's Master Storm Water System Maintenance Program to ensure storm conveyance facilities remain free of debris that can reduce their capacity, and coordinate with the City engineer to monitor and improve storm water systems in the Project area. (City of San Diego, 2014a, p. PF-5; T&B Planning, 2017). Additionally, in accordance with the City's Municipal Storm Water Permit, future development projects would be required to implement BMPs during construction.

In addition to the policies discussed above and contained in the OMCPU and the CVSP, future development projects would be required to comply with OMCPU Final PEIR Mitigation Frameworks HYD/WQ-1 and HYD/WQ-2. All future development projects would be required to meet the standards outlined in the City of San Diego Drainage Design Manual and would be required to fully meet the City of San Diego Storm Water Standards in effect at the time of approval. Mitigation Framework HYD/WQ-1 requires the designs of a new or improved system to meet local and state regulatory requirements to the sanctification of the City Engineer and Mitigation Framework HYD/WQ-2 requires the Project Applicant to demonstrate that the Project is sited and designed to minimize impacts on receiving waters and mitigate impacts in accordance with the City of San Diego Stormwater Requirements.

Under existing conditions, the Project site contains one residence. The majority of drainage on the Project site drains to the south across the Project site and into the Lumina property located immediately south of the Project site. Overall, the Project site drains to a steep finger canyon (Wruck Creek) located west of the Cactus Road and Siempre Viva Road intersection. Two of the finger canyons drain to sump areas that are collected and drained to the west and discharged downstream within the canyon via an existing reinforced concrete pipe (RCP) storm drain per City Drawing 23871-21-D. (PDC, 2019a, p. 3)

The Project proposes to maintain the existing overall drainage patterns. The flows originating from the Project site would drain into the storm drain improvements for the adjacent off-site Lumina project and the drainage will be detained in the Lumina South Basin. Table 3, *Existing vs. Proposed Flows for the South Basin*, presents the existing and the Project's flows in conjunction with the Lumina project's proposed drainage patterns and rates of runoff.

Table 3 Existing vs. Proposed Flows for the South Basin

Return Period	Pre-project Qpeak (cfs)	Post-project - Mitigated Q (cfs)
LF = 0.5xQ2	5.886	2.241
2-year	11.772	4.482
5-year	18.052	11.162
10-year	21.327	14.182

(PDC, 2018, Table 3)

With future development of the Project site, the rate of storm water runoff from the site would be decreased as compared to the runoff flow rates that occur under existing conditions. Table 4, *Existing vs. Proposed South Basin Drainage Calculations*, shows the overall drainage calculations for portion of the Lumina project that would drain to the south basin and the proposed Lumina II Project. As noted in Table 4, the area contributing to drainage facilities would increase slightly by 1.6 acres and runoff under the 100-year storm flow scenario would be decreased by 23.6 cubic feet per second (cfs) with implementation of the Project and the previously approved Lumina project. Although future development on the Project site would result in an increase in impervious surfaces, the Project would decrease runoff as compared to existing conditions and would not result in substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes. The Project's Drainage Plan has been designed to meet the City's stormwater requirements and would generally retain the site's existing topographic character, except as necessary to allow for proper drainage flows and comply with current storm water requirements. Accordingly, and consistent with the findings of the OMCPU Final PEIR, the Project's impacts associated with increased runoff which could exceed the capacity of existing or planned stormwater drainage systems or provide substantial sources of polluted runoff would be less than significant.

Table 4 Existing vs. Proposed South Basin Drainage Calculations

	EXISTING CONDITIONS			PROPOSED CONDITIONS		
Outfall of Interest	*System*	*Q_{100} (cfs)*	*Contrib. Area (acres)*	*System*	*Q_{100} (cfs)*	*Contrib. Area (acres)*
South	System 100	28.4	20.7	System 1000	151.6 undetained 36.2 detained	63.4
	System 200	54.0	49.3	System 2000	10.2	8.2
	Subtotal:	**82.4**	**70.0**	**Subtotal:**	**46.4**	**71.6**

(PDC, 2019a, Appendix 2, Table 2)

The Project site is located within the Tijuana River Valley drainage basin. The Project would allow for future development that would increase impervious surfaces in the Project area, which would lead to increased runoff that could result in modifications to the natural drainage system or affect the Tijuana River Valley drainage basin. However, future development on the Project site is required to design storm drain systems that comply with OMCPU and CVSP policies pertaining to the development of adequate storm drain facilities, including OMCPU Policies 6.3-1 through 6.3-5 and CVSP Design Standards 2.6-5 through 2.6-12, which require future projects to use sustainable infrastructure design to capture and control runoff, incorporate BMPs, improve drainage facilities in conjunction with development projects, implement the City's Master Storm Water System Maintenance Program to ensure storm conveyance facilities remain free of debris that can reduce their capacity, and coordinate with the City engineer to monitor and improve storm water systems in the Project area. (City of San Diego, 2014a, p. PF-5; T&B Planning, 2017). Additionally, in accordance

with the City's Municipal Storm Water Permit, future development projects would be required to implement BMPs during construction.

In addition to the policies discussed above and contained in the OMCPU and CVSP, future development projects would be required to comply with OMCPU Final PEIR Mitigation Framework HYD/WQ-2. Mitigation Framework HYD/WQ-2 requires the Project Applicant to demonstrate that the Project is sited and designed to minimize impacts on receiving waters and to mitigate impacts in accordance with the City of San Diego Stormwater Requirements.

As discussed above, implementation of the Project would generally maintain the natural drainage system in the area and would result in reduced stormwater flows compared to existing conditions. The Project's flows would drain to the Lumina project's South Basin, which serves as biofiltration, hydromodification, and detention basin. Upon buildout of the Project storm water runoff from the site would be decreased as compared to the runoff flow rates that occur under existing conditions. Although the future development on the Project site would result in an increase in impervious surfaces, the Project would decrease in the rate of runoff as compared to existing conditions and would not result in modifications to the natural drainage system and would not adversely affect the Otay or Tijuana River Valley drainage basins. The Project's Drainage Plan has been designed to meet the City's stormwater requirements and would generally retain the site's existing topographic character, except as necessary to allow for proper drainage flows and comply with current storm water requirements. The existing downstream stormwater drainage facilities have adequate capacity to handle the Project's slight increase in area contributing runoff to drainage facilities.

Accordingly, and consistent with the findings reached in the OMCPU Final PEIR, runoff from the Project site would not substantially alter the existing drainage pattern of the Project site in a manner that would result in substantial impacts on-site or substantial impacts to the Otay or Tijuana River Valley drainage basins off-site, and a less-than-significant impact would occur.

As noted in the OMCPU Final PEIR and in accordance with the City's 2011 Significance Determination Thresholds, significant impacts associated with altered flow patterns would result if a project-related increase in stormwater flows would increase on- or off-site flooding hazards pursuant to mapped FEMA floodplains (City of San Diego, 2011, p. 43). The Project site is not located within a mapped FEMA flood zone (City of San Diego, 2014b, Figure 5.7-1); thus, the Project would not result in alterations to the course or flow of flood waters and impacts would be less than significant. Moreover, as discussed under Threshold a, the Project reduces the 100-year peak flow rates as compared to existing conditions, and would therefore reduce potential flooding impacts to downstream properties. Additionally, the Project complies with the City's Storm Water Standards and applicable General Plan and OMCPU policies related to flood hazards. Based on these considerations, and consistent with the conclusion reached in the OMCPU Final PEIR, the Project would not alter the course or flow of flood waters. Impacts would be less than significant.

The Project conforms to the land use configurations and intensities identified in Addendum No. 408329 and generally conforms to the land use configurations and intensities identified in the OMCPU Final PEIR. The Project is located in the Tijuana River Watershed and is tributary to the Tijuana River and the Tijuana River Estuary. The Tijuana River is identified as being "impaired" in accordance with the Clean Water Act 303(d) list regulation by the following pollutants: eutrophic, indicator bacteria, low dissolved oxygen, pesticides, phosphorus, sedimentation/ siltation, selenium,

solids, surfactants, synthetic organics, total nitrogen as "N," toxicity, trace elements, and trash. The Tijuana River Estuary is identified as being "impaired" by the following pollutants: eutrophic, indicator bacteria, lead, low dissolved oxygen, nickel, pesticides, thallium, trash, and turbidity. (PDC, 2019b, p. 20)

Construction associated with the Project and future development on the Project site have the potential to create pollutant discharges that could impact surface and ground water quality, and have the potential to result in increased pollutant discharges including downstream sedimentation. Each is discussed below.

The Project would involve grading activities and future development would include construction activities that would result in the generation of water quality pollutants such as silt, debris, chemicals, paints, and other solvents with the potential to adversely affect water quality. As such, short-term water quality impacts have the potential to occur during construction of the Project in the absence of any protective or avoidance measures.

Pursuant to the requirements of the San Diego RWQCB and the City of San Diego, as well as OMCPU Final PEIR Mitigation Framework HYD/WQ-1, future construction activities associated with buildout of the Project would be subject to a NPDES Municipal Stormwater Permit for construction activities. The NPDES permit is required for all projects that include construction activities, such as clearing, soil stockpiling, grading, and/or excavation that disturb at least one (1) acre of total land area. Mandatory adherence to a NPDES Permit would ensure that the Project does not violate any water quality standards or waste discharge requirements during construction activities. Compliance with the NPDES permit also requires the preparation and implementation of a SWPPP that would specify the BMPs that the Project would be required to implement during construction activities to ensure that all potential pollutants of concern (including sediment) are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the Project site. Mandatory compliance with the SWPPP would ensure that the Project does not violate any water quality standards or waste discharge requirements during construction activities. Consistent with the findings of the OMCPU Final PEIR, water quality impacts associated with construction activities would be less than significant.

Storm water pollutants commonly associated with the land uses allowed on-site per the CVSP (i.e., residential uses) include nutrients, heavy metals, bacteria/virus /pathogens, pesticides, oil and grease, toxic organic compounds, trash, and dry weather runoff, which are considered primary pollutants of concern. The Project includes a site-specific WQMP (*Appendix E2*) to demonstrate compliance with the City's NPDES permit and to minimize the release of potential waterborne pollutants, including pollutants of concern for downstream receiving waters. The WQMP is a site-specific post-construction water quality management program designed to address the pollutants of concern of a development project via BMPs, implementation of which ensures the on-going protection of the watershed basin. The WQMP identifies permanent source control BMPs, including prevention of illicit discharges into the MS4, storm drain stenciling, and protecting trash storage areas from rainfall (PDC, 2019b, p. 24). The WQMP also identifies additional BMPs based on the following potential sources of runoff pollutants: on-site storm drain inlets, interior floor drains and elevator shaft sump pumps, interior parking garages, need for future indoor and structural pest control, landscape/outdoor pesticide use, pools and other water features, refuse areas, fire sprinkler test water, miscellaneous drain or wash water, plazas, sidewalks and parking lots (PDC, 2019b, p.

25). The WQMP also identifies site design BMPs, including maintaining natural drainage pathways and hydrologic features and conserving natural soils and vegetation areas (PDC, 2019b, p. 25). These control measures are intended to minimize, prevent, and/or otherwise appropriately treat storm water runoff flows before they are discharged from the site. Compliance with the site-specific WQMP would be required as a standard condition of Project approval and long-term maintenance of on-site BMPs would be required to ensure their long-term effectiveness, thereby ensuring that the Project and future development on-site does not create discharges that would increase pollutant discharges downstream during long-term operation.

The Project would be required to comply with City's Storm Water Runoff and Drainage Regulations and the regulations of other agencies (e.g., RWQCB). Mandatory compliance with State and local regulations, future development compliance with OMCPU Final PEIR Mitigation Frameworks HYD/WQ-1 and HYD/WQ-2, future required SWPPP, and the Project's WQMP would ensure that impacts to water quality and pollutant discharge would be reduced to below a level of significance. Accordingly, and consistent with the findings of the OMCPU Final PEIR, impacts due to discharges into surface or ground water, any alteration of water quality, and increases in pollutants, including downstream sedimentation would be less-than-significant.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the PEIR occur.

GEOLOGY AND SOILS

OMCPU Final PEIR

The OMCPU Final PEIR found that the OMCPU area contains geologic conditions that could expose people or property to geologic hazards at the project-level; therefore, future development associated with implementation of the OMCPU would result in potentially significant impacts related to geologic hazards. The OMCPU Final PEIR noted that although no Alquist-Priolo Earthquake Fault Zones occur within the OMCPU area, the OMCPU area is subject to moderate to high geologic risk area due to the presence of the La Nación Fault Zone, which is located 2.3 miles west of the Project site. Faults in this zone are considered to be potentially active and would subject the OMCPU area to moderate to severe ground shaking. The OMCPU Final PEIR also concluded that the potential for liquefaction and seismically induced settlement on mesa top areas such as the Project site is very low due to the very dense cemented condition of the geologic formations and lack of groundwater. (City of San Diego, 2014b, p. 5.8-6) The OMCPU Final PEIR also disclosed that a complex of deep-seated landslides known as the San Ysidro Landslide is present in the western and southern edges of the OMCPU area. Apparent landslide debris was found to at least 100 feet below the ground surface, placing the bottom of the landslides below present sea level and indicating an ancient and complex history of movement. The OMCPU Final PEIR concluded that assuming compliance with applicable General Plan and OMCPU policies and implementation of Mitigation Framework GEO-1, potential impacts related to geologic hazards would be reduced to below a level of significance. (City of San Diego, 2014b, p. 5.8-15)

The OMCPU Final PEIR found that buildout of the OMCPU would result in potentially significant impacts related to soil erosion due to the steep hillsides and loose nature of sedimentary materials

and soils contained within the OMCPU area. The OMCPU Final PEIR identified Mitigation Framework GEO-2 to reduce potential impacts, which generally requires future development projects to adhere to the City's Grading Regulations, National Pollutant Discharge Elimination System (NPDES) permit requirements, and the recommendations included in future site-specific geotechnical reports prepared in conformance with the City's Geotechnical Report Guidelines, CBC, and LDC as would be required for implementing developments. The OMCPU Final PEIR concluded that assuming compliance with applicable General Plan and OMCPU policies and implementation of Mitigation Framework GEO-2, impacts associated with erosion would be reduced to below a level of significance.

Project

A site-specific Geotechnical Report was prepared for the Project by Advanced Geotechnical Solutions, Inc. (AGS) and is included as *Appendix F*. The Geotechnical Report notes that no faults are mapped that traverse or are trending toward the Project site. The Silver Strand section of the Newport-Inglewood-Rose Canyon Fault Zone is the closest known active fault to the Project site and is located approximately nine miles west of the Project site. The risk associated with ground rupture due to faulting is low and impacts as a result of faulting would be less than significant. Major earthquakes occurring on the Newport-Inglewood-Rose Canyon Fault Zone, or other regional active faults located in southern California area, could subject the site to moderate to severe ground shaking, which is the same conclusion reached by the OMCPU Final PEIR. (AGS, 2019, pp. 8-9)

The Geotechnical Report noted that the Project is not located within an area zoned by the County of San Diego as a potential liquefaction area. The potential for liquefaction during a strong earthquake would be limited to areas with localized, loose lenses/layers of sandy soils. Due to the Project's remedial grading and dense nature of the geological formation materials and proposed fills within the limits of the Project area, the risk associated with liquefaction, lateral spreading, or seismically-induced settlement is considered remote. (AGS, 2019, p. 9)

The Geotechnical Report indicates that the Project site is relatively level and does not have any slopes greater than five feet in height. No evidence of landslides has been mapped within the Project site. The nearest mapped landslides are located west of the Project site within canyon drainage areas. The Project site is underlain by essentially flat-lying Lindavista Formation and San Diego Formation. The Otay Formation was also mapped below the San Diego Formation on-site. The Geotechnical Report notes that Otay Formation can be susceptible to mass wasting, due to the common bentonitic clay beds found in the soil unit. Based on site-specific information, the Geotechnical Report determined that the potential for landsliding on-site is low; therefore, impacts related to earthquake induced landslides would be less than significant. (AGS, 2019, p. 11)

The Project's Geotechnical Report (*Appendix F)* includes site-specific recommendations and remedial grading measures that would reduce impacts due to exposure of people or property to geologic hazards to less than significant. Accordingly, and consistent with the finding of the OMCPU Final PEIR, with implementation of recommendations included in the Project's Geotechnical Report (*Appendix F)*, impacts associated with geologic hazards including earthquake faults, ground shaking, liquefaction, and landslides would be less than significant. Furthermore, future development on-site would be required to comply with OMCPU Final PEIR Mitigation Frameworks GEO-1 and GEO-2.

The proposed Lumina II Project would implement the land uses and circulation system established as part of the CVSP, which in turn was adopted to implement the OMCPU. Thus, the Project does not entail any land use or circulation modifications. Notwithstanding, construction activities and long-term operational activities associated with the Project would have the potential to result in the increased potential for erosion either on or off site. Each is discussed below.

Construction-Related Activities

Grading activities that would occur as part of the Project would expose underlying soils, which would increase erosion susceptibility during grading activities. Exposed soils could be subject to erosion during rainfall events or high winds due to the removal of stabilizing vegetation and exposure of these erodible materials to wind and water. Erosion by water would be greatest during the first rainy season after grading (before landscaping becomes established). Erosion by wind would be highest during periods of high wind speeds. With the exception of two reentrant canyons in the northwest and southwest portions of the site, the property is generally flat and erosion potential is not substantial.

Pursuant to the requirements of the State Water Resources Control Board, grading activities associated with the Project and construction associated with future development projects would be required to obtain a NPDES permit for construction activities. A NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one acre of total land area. The City's Municipal Separate Storm Sewer System (MS4) NPDES Permit requires the Project Applicant to prepare and submit to the San Diego Regional Quality Control Board (SDRQCB) for approval a Project-specific Storm Water Pollution Prevention Plan (SWPPP), which would address erosion during construction. The SWPPP must identify and implement an effective combination of erosion control and sediment control measures (i.e., Best Management Practices, or BMPs) to reduce or eliminate discharge to surface water from storm water and non-storm water discharges. Adherence to the requirements noted in the Project's required site-specific SWPPP during construction activities on- and off-site would further ensure that potential erosion and sedimentation effects would be less than significant. Consistent with the findings of the OMCPU Final PEIR, mandatory adherence to the requirements noted in the site-specific SWPPP, as would be required for the Project, would ensure that potential construction-related effects associated with water erosion would be less than significant.

During grading and other construction activities involving soil exposure or the transport of earth materials, § 142.0101 et seq. of the City of San Diego Municipal Code, which establishes grading regulations, also would apply (City of San Diego, 2020, § 142.0101 et seq). Furthermore, and consistent with the findings of the OMCPU Final PEIR, the Project Applicant prepared a site-specific geotechnical investigation (*Appendix F*) and hydrology study (*Appendix E1*) to identify measures needed in the long term reduce erosion at the project level. The Project would be required to comply with the recommendations of the site-specific geotechnical investigation. Consistent with the findings of the OMCPU Final PEIR, mandatory compliance with regulatory requirements, policies, and the recommendations in the Project's Geotechnical Report (*Appendix F)* would ensure that water and wind erosion impacts during construction would be less than significant.

Long-Term Operational Activities

Following construction of future development, wind and water erosion on the Project site would be minimized, as future development includes urban land uses and the areas disturbed during construction would be landscaped or covered with impervious surfaces and drainage would be controlled through a storm drain system. Furthermore, future development would be subject to compliance with the drainage requirements contained in the preliminary hydrologic analysis prepared for the Project (included as *Appendix E1*). In addition, the Project's Stormwater Quality Management Plan (WQMP) requires Structural Storm Water BMPs to reduce pollutants in stormwater runoff and hydromodification requirements to control runoff volumes and flow durations in accordance with the City's MS4 Permit. In addition, the CVSP contains drainage standards that require future development, including the Project, to incorporate one of the five BMP strategy options contained in the CVSP's hydrologic study (see Section 2.6.2 of the Specific Plan). Compliance with these requirements would ensure that the rate of runoff from the site does not increase in comparison to existing conditions, thereby precluding the potential for increased erosion hazards downstream. Therefore, implementation of the land use and circulation modifications associated with the Project would not significantly increase the risk of erosion on- or off-site in the long term, and impacts would be less than significant.

As indicated in the above analysis of near- and long-term conditions, the Project would not result in substantial soil erosion or the loss of topsoil during construction or long-term operation. Accordingly, and consistent with the findings of the OMCPU Final PEIR, impacts would be less than significant.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the PEIR occur.

ENERGY CONSERVATION

OMCPU Final PEIR

The OMCPU Final PEIR found that construction of future projects associated with implementation of the OMCPU would not result in the use of excessive amounts of fuel or other forms of energy and construction-related impacts would be less than significant. In addition, the OMCPU Final PEIR found that implementation of the OMCPU would not result in the need for new electrical systems or require substantial alteration of existing utilities; therefore, assuming compliance with local and state mandates for energy conservation and OMCPU policies related to energy reduction measures, the OMCPU Final PEIR found that long-term operation impacts associated with energy use would be less than significant.

Project

Construction-Related Activities

Grading and construction activities associated with the Project and future development on-site would consume energy through the use of heavy equipment, trucks, and worker traffic.

Construction activities associated with the Project and future development on-site would be similar to what was assumed by the OMCPU Final PEIR. In fact, less development would occur on-site than was assumed by the OMCPU Final PEIR, and therefore would result in a concomitant reduction in construction-related energy consumption. There are no components of the construction phase that would result in a demand for energy that exceeds what is typically required for new development. As such, construction of the Project and future development on-site would not result in the use of excessive amounts of electricity or fuel or other forms of energy, and impacts would be less than significant.

Long-Term Operational Activities

Future development would be required to meet mandatory energy standards in accordance with Title 24, Building Energy Standards, of the California Public Resources Code. In addition, future development on site would be required to comply with CVSP Design Standard 2.6-12 and Policies 2.5-4, 2.5-14, 2.5-57 and 2.5-170, which encourage the use of energy efficient lighting, the incorporation of shade structures to reduce solar heat gain, and building design features that maximize natural ventilation to take advantage of natural daylight and prevailing breezes (T&B Planning, 2017). Furthermore, the CVSP includes a slight reduction in building intensity as compared to what was assumed by the OMCPU Final PEIR; thus, energy consumption associated with future buildings on site would be less than was disclosed by the OMCPU Final PEIR.

Additionally, future development on site would result in an increase in consumption of fossil fuels associated with vehicular traffic. However, Addendum No. 408329 to the OMCPU Final PEIR found that buildout of the CVSP, including the Project site, would result in a substantial reduction in traffic as compared to what was evaluated in the OMCPU Final PEIR. Specifically, the OMCPU Final PEIR anticipated that the CVSP area would generate approximately 41,109 average daily external trips, as compared to 36,354 average daily external trips that actually would be associated with the CVSP (a reduction of approximately 11.6%). Because the Project is fully consistent with the CVSP in terms of land use intensity, it can also be concluded that buildout of the proposed Lumina II Project also would result in a decrease in the amount of traffic generated by the site as compared to what was evaluated and disclosed by the OMCPU Final PEIR. Furthermore, the Project would be required to comply with Specific Plan policies that are intended to improve walkability (CVSP Policies 2.5-6, 2.5-15, 2.5-17, 2.5-20, and 2.5-22), expand public transit facilities and encourage transit use in the Project area (CVSP Section 2.3.2.1), and encourage bicycle use in the Project area (CVSP Design Standard 2.3-18 and Policy 2.5-20). Adherence to the Specific Plan policies associated with enhancing walkability throughout the Project area would likely reduce the estimated daily vehicle trips, thereby reducing transportation-related fuel consumption.

As indicated in the above analysis of near- and long-term conditions, the Project and future development on-site would not result in the use of excessive amounts of fuel or other forms of energy during construction or long-term operation of the Project. Accordingly, and consistent with the findings of the OMCPU Final PEIR, impacts would be less than significant.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the PEIR occur.

NOISE

OMCPU Final PEIR

The OMCPU Final PEIR noted that the OMCPU area has the potential to expose noise-sensitive uses to noise levels in excess of standards established in the City's General Plan, Noise Abatement and Control Ordinance ("Noise Ordinance"; Section 59.5.0101 et seq. of the City's Municipal Code), and land use compatibility guidelines in the Brown Field Comprehensive Land Use Plan (City of San Diego, 2020). The EIR noted that mandatory compliance with federal, state, and local regulations and policies would reduce direct and indirect impacts associated with the generation of noise levels in excess of standards established in the General Plan or Noise Abatement and Control Ordinance. The EIR also imposed Mitigation Framework NOI-1 and NOI-2, which require regulatory compliance to ensure that impacts related to exterior and interior noise are reduced; however, even with strict adherence to the Mitigation Framework, the OMCPU Final PEIR concluded that these impacts cannot be reduced to below a level of significance and therefore concluded that the impacts would remain significant and unavoidable. (City of San Diego, 2014b, pp. 5.10-12 through 5.10-20)

The OMCPU Final PEIR found that buildout of the OMCPU would locate noise-sensitive residential uses adjacent to noise-generating commercial and industrial uses, which would result in potentially significant noise impacts. The OMCPU Final PEIR identified mitigation framework NOI-3 to reduce potential impacts, which generally requires the preparation of a site-specific acoustical/noise analysis in accordance with the City Acoustical Report Guidelines and policies contained in the General Plan and OMCPU. The OMCPU Final PEIR concluded that even with implementation of mitigation framework NOI-3, potential impacts would remain significant. As such, impacts related to the generation of noise that exceed City standards were disclosed as a significant and unavoidable impact and a statement of overriding considerations was adopted.

The OMCPU Final PEIR found that buildout of the OMCPU would not result in the exposure of people to current or future noise levels which exceed standards established in the land use compatibility guidelines in the Brown Field Municipal Airport Land Use Plan Compatibility Plan. Buildout of the OMPCU would not locate residential uses within the Brown Field contours and noise levels would not exceed 70 Community Noise Equivalent Level (CNEL) at nearby industrial uses, which is the noise level standard established in the Brown Field land use compatibility guidelines. Furthermore, the OMCPU Final PEIR found that the OMPCU would not locate residential uses within the General Abelardo L. Rodriguez International Airport 70 CNEL contour. Therefore, the OMCPU Final PEIR concluded that impacts due to exposure of people to current or future noise levels which exceed standards established in the land use compatibility guidelines in the Brown Field Municipal Airport Land Use Plan Compatibility Plan would be less than significant. (City of San Diego, 2014b, pp. 5.10-23 and 5.10-24)

The OMCPU Final PEIR concluded that future construction activities would be required to comply with the recommendations included in project-specific acoustical reports prepared in accordance with City Acoustical Report Guidelines, the General Plan, OMCPU policies, and other regulatory or guidance documents. Additionally, the OMCPU Final PEIR imposed Mitigation Framework NOI-4, which requires compliance with the City's Noise Abatement and Control Ordinance to reduce construction-related noise impacts. The OMCPU Final PEIR also imposed Mitigation Framework LU-2, which requires development projects adjacent to designated MHPA areas to comply with the Land

Use Adjacency Guidelines in the MSCP in terms of noise. However, even with strict adherence to the Mitigation Frameworks, impacts due to construction-related noise adversely impacting sensitive receptors and sensitive bird species with the MHPA were found to be significant and unavoidable. (City of San Diego, 2014b, pp. 5.10-24 through 5.10-26)

Project

Construction activities associated with the Project would increase ambient noise levels in the vicinity on an intermittent but temporary basis. Noise levels during construction would fluctuate depending on the construction phase, equipment type, and duration of use, distance between the noise source and receptor, and the presence or absence of barriers between the noise source and receptor. Consistent with the findings in the OMCPU Final PEIR, the Project would be subject to compliance with federal, State, and local regulations and policies which would reduce construction-related noise impacts. The Project would implement Mitigation Measure MM-5, as detailed in the MMRP, to reduce impacts related to construction noise to a less than significant level. This mitigation measure would be consistent with OMCPU Final PEIR Mitigation Framework Measure NOI-4. Furthermore, future development on-site would be required to comply with OMCPU Final PEIR Mitigation Framework NOI-4.

Moreover, under existing conditions there are no sensitive noise receptors in the Project area. As such, while the Project has the potential to result in construction-related noise levels that exceed City standards, any such noise would not impact sensitive receptors. Notwithstanding, there is a potential that construction activities on site could occur following occupancy of residential uses on site, which could result in the exposure of sensitive receptors to excessive construction-related noise. Consistent with the findings in the OMCPU Final PEIR, even with strict adherence to the Mitigation Framework, the Project's construction-related noise impacts would be significant and unavoidable at the Tentative Map level of analysis. Therefore, implementation of the Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU Final PEIR.

Under long-term operation, the Project would have the potential to exceed the noise significance criteria contained in the Noise Element of the General Plan. However, as a proposed residential community, the Project's primary potential for creating noise impacts would be associated with Project traffic. As documented in Addendum No. 408329 to the OMCPU Final PEIR, buildout of the CVSP (including the Project site) would result in a reduction in average daily traffic as compared to what was evaluated in the OMCPU Final PEIR, thereby resulting in reduced vehicular-related noise impacts as compared to what was evaluated and disclosed by the OMCPU Final PEIR. Specifically, buildout of the CVSP would result in 36,354 external daily trips, as compared to the 41,109 external daily trips assumed for the CVSP area by the OMCPU Final PEIR. The Project's vehicular trips would be within the traffic assumptions for the overall CVSP area; thus, the Project would generate similar traffic-related noise as the assumptions anticipated in Addendum No. 408329 and would be below the traffic-related noise assumptions anticipated for the CVSP area by the OMCPU Final PEIR.

In regards to on-site land uses, the Project designates development areas for residential uses where traffic-related noise levels would exceed the City's noise level compatibility standards (i.e., proposed residential uses adjacent to Cactus Road) as reported in the OMCPU Final PEIR and Addendum No. 408329. Typical residential construction in California, conducted in compliance with the California

Building Standards Code, provides approximately 10 to 15 dBA of noise reduction from exterior noise sources with windows partially open, and approximately 20 to 25 dBA of noise reduction with windows closed. Thus, as a rule of thumb, where exterior noise levels are below 65-dBA CNEL, interior noise levels for new construction would typically meet the interior 45-dBA CNEL standard for residential uses established in the California Code of Regulations, Title 24.

Additionally, because future development would include exterior noise levels are 65 to 70 dBA CNEL, interior noise can be reduced with standard wall and window construction, and the inclusion of mechanical forced-air ventilation to allow occupants the option of maintaining windows closed to control noise. As stated in the OMCPU Final PEIR, where exterior noise levels exceed 70 dBA CNEL, residential units would not normally be able to meet the 45-dBA CNEL interior standard through typical construction methods. Thus, the OMCPU Final PEIR stated that noise-sensitive uses located within the 70 dBA CNEL will require acoustical study at the project-level, and may require enhanced design features, such as windows and doors with higher Sound Transition Class (STC) ratings to meet the 45-dBA CNEL criteria. Applicable provisions of OMCPU Final PEIR Mitigation Measures NOI-1, NOI-2, and NOI-3 would apply to future development, which require acoustical study at the future development project level to determine appropriate construction materials as needed to achieve the City's interior and exterior noise standards.

Although it is expected that future development would meet the City's interior and exterior noise standards and that traffic-related noise would be reduced in comparison to what was evaluated by the OMCPU Final PEIR, it cannot be determined at the Tentative Map level of analysis whether the Project would result in significant operational noise impacts. Accordingly, and consistent with the findings in the OMCPU Final PEIR, even with strict adherence to the Mitigation Framework the Project's long-term operational noise impacts would be significant and unavoidable at the Tentative Map level of analysis. Therefore, implementation of the Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU Final PEIR.

Based on the analysis of noise impacts above, there would be no new impacts associated with noise beyond what was analyzed in the OMCPU Final PEIR and Addendum No. 408329. Therefore, the Project would be within the scope of analysis of the OMCPU Final PEIR, and the level of impact (significant and unavoidable) would be similar to that cited in Addendum No. 408329 and would be reduced in comparison to what was disclosed by the OMCPU Final PEIR.

Generation of noise from certain types of land uses in the Project area would cause potential land use incompatibility. Noise levels at the property line that exceed Section 59.5.0401 of the City's Municipal Code are considered potentially significant. Section 59.5.0401 of the City's Noise Ordinance sets the operational exterior noise limit for multi-family residential uses at 55 dBA Leq for daytime hours of 7 a.m. to 7 p.m., 50 dBA Leq for the hours between 7 p.m. to 10 p.m., and 45 dBA Leq during the noise sensitive nighttime hours of 10 p.m. to 7 a.m. The Project would introduce residential uses in proximity to existing or planned off-site light and heavy industrial uses. The noise levels that have the potential to be generated by off-site industrial uses could expose noise-sensitive land uses within the Project site to noise levels that may exceed noise level limits specified in the City's Noise Ordinance.

The juxtaposition of the future land use within the Project site could result in significant noise impacts to sensitive receptors on-site. This potential was acknowledged by the OMCPU Final PEIR. While the City's applicable regulations and policies would reduce direct and indirect impacts associated with the generation of noise levels in excess of standards established in the General Plan or Noise Ordinance, no Project-level site plans are proposed as part of the Project at this time. Without detailed operational data and site plans, which will not be identified until the Project Applicant seeks a NDP and/or building permits, it cannot be determined whether on-site noise levels affecting sensitive receptors (i.e., residential uses) would exceed City standards. As the degree of on-site noise level impacts cannot be determined at the Tentative Map level of analysis, and consistent with the conclusion reached by the OMCPU Final PEIR, on-site noise impacts would be potentially significant.

Consistent with the conclusions reached by the OMCPU Final PEIR, even with strict adherence to the required mitigation, impacts associated with collocation of residential and light/heavy industrial land uses has the potential to remain significant and unavoidable. There are no components of the Project that would worsen the level of impact compared to the potential impacts disclosed in the OMCPU Final PEIR. Accordingly, and consistent with the conclusion reached in the OMCPU Final PEIR, impacts due to collocation residential and commercial/land uses resulting in noise exposure that would exceed the City's Noise Ordinance would be significant and unavoidable.

The Project site is located outside of the 60-65 dB CNEL contour area for both Brown Field and the General Abelardo L. Rodriguez International Airport, which is the noise level standard established in the land use compatibility guidelines. As such, the Project would not be exposed to airport-related noise levels exceeding 60 dB CNEL. (ALUC, 2010, Exhibit III-1) Thus, and consistent with the conclusion reached in the OMCPU Final PEIR, the Project would not result in the exposure of people to current or future noise levels which exceed standards established in the land use compatibility guidelines in the Brown Field Municipal Airport Land Use Plan Compatibility Plan. Accordingly, and consistent with the conclusion reached in the OMCPU Final PEIR, impacts due to airport-related noise would be less than significant. Therefore, implementation of the Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU Final PEIR.

The Project conforms to the development area identified in the OMCPU, as amended by the CVSP, and would result in a reduction in overall building area as compared to what was assumed for the site by the OMCPU Final PEIR. As such, it can be reasonably assumed that construction of the Project would result in the same or slightly reduced noise levels as compared to what was disclosed by the OMCPU Final PEIR and the Addendum.

Although construction noise would be localized to discrete locations during construction, businesses, residences, recreational facilities, and noise-sensitive wildlife species using open space areas in and around the Project area could be intermittently exposed to temporary elevated levels of noise throughout the construction period. Specifically, the OMCPU Final PEIR indicated that CAGN occupying habitat in the MHPA could be adversely impacted by temporary construction noise if construction occurs during the breeding season. Therefore, the Project's potential to directly and indirectly affect the CAGN due to construction noise does not represent a new impact. Consistent with the findings of the OMCPU Final PEIR, this is a potentially significant impact to humans and

potentially to wildlife (CAGN in particular) due to the potential for high short-term and instantaneous noise levels during peak construction activity.

Due to the potential for high short-term and instantaneous noise levels during peak construction activity at nearby residential properties, the Project and future implementing development within the Project area would be required to comply with OMCPU Final PEIR Mitigation Framework NOI-4, which requires the preparation of a Construction Noise Mitigation Plan to reduce noise levels associated with construction. However, and consistent with the findings of the OMCPU Final PEIR, even with the application of Mitigation Frameworks NOI-4, it cannot be assured that construction noise impacts would be reduced to below a level of significance at the Tentative Map level of analysis. Implementation of the Project would not exacerbate construction-related impacts beyond what was evaluated and disclosed in the OMCPU Final PEIR and Addendum.

With respect to traffic-related noise, and as documented in Addendum No. 408329 to the OMCPU Final PEIR, buildout of the CVSP (including the Project site) would result in a reduction in average daily traffic as compared to what was evaluated in the OMCPU Final PEIR, thereby resulting in reduced vehicular-related noise impacts as compared to what was evaluated and disclosed by the OMCPU Final PEIR. Specifically, buildout of the CVSP would result in 36,354 external daily trips, as compared to the 41,109 external daily trips assumed for the CVSP area by the OMCPU Final PEIR. The Project's vehicular trips would be within the traffic assumptions for the overall CVSP area; thus, the Project would generate similar traffic-related noise as the assumptions anticipated in Addendum No. 408329 and would be below the traffic-related noise assumptions anticipated for the CVSP area by the OMCPU Final PEIR.

Based on the foregoing analysis, the Project would result in temporary construction noise from the proposed neighborhood developments and would contribute to traffic-related noise impacts. While compliance with the Mitigation Frameworks identified in the OMCPU Final PEIR would reduce both near- and long-term noise levels, it cannot be assured at the Tentative Map level of analysis whether noise impacts could be reduced to less-than-significant levels. As such, and consistent with the conclusions reached by the OMCPU Final PEIR, Project noise impacts would be significant and unavoidable.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the PEIR occur.

PALEONTOLOGICAL RESOURCES

OMCPU Final PEIR

The OMCPU Final PEIR found that the OMCPU area contains geologic structures with moderate and high sensitivity potential for paleontological resources; therefore, implementation of the OMCPU was determined to result in a potentially significant impact to paleontological resources. The OMCPU Final PEIR identified Mitigation Framework PALEO-1 to reduce potential impacts, which generally requires future development projects to monitor for paleontological resources during construction activities and to be sited and designed to minimize impacts on paleontological resources in accordance with the City's Paleontological Resources Guidelines and CEQA Significance

Thresholds. The OMCPU Final PEIR found that with implementation of Mitigation Framework PALEO-1, program-level impacts related to paleontological resources would be reduced to below a level of significance. (City of San Diego, 2014b, pp. 5.11-5 through 5.11-9)

Project

The Project site contains the Lindavista Formation, which is assigned a "moderate paleontological sensitivity". Excavations associated with Project construction would encroach into the sensitive soils found on the Project site. Therefore, ground-disturbing construction activities associated with the Project would have the potential to result in significant impacts to paleontological resources that may be buried beneath the surface. (City of San Diego, 2014b, pp. 5.11-5 through 5.11-9)

The Project would implement Mitigation Measure MM-6, as detailed in the MMRP, to reduce impacts related to paleontological resources to a less than significant level. This mitigation measure would be consistent with OMCPU Final PEIR Mitigation Framework Measure PALEO-1. Accordingly, and consistent with the findings of the OMCPU Final PEIR, implementation of the Project would result in a less-than-significant impact to paleontological resources.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the PEIR occur.

TRANSPORTATION/CIRCULATION

OMCPU Final PEIR

The OMCPU Final PEIR found that buildout of the OMCPU would result in significant impacts to roadway segments, intersections, and SR-905 freeway segments and metered freeway on-ramps. The OMCPU Final PEIR concluded that implementation of the OMCPU would result in significant and unmitigated impacts to 24 roadway segments. The OMCPU Final PEIR identified Mitigation Framework TRF-1 to reduce impacts to 49 intersections, which generally requires intersections to be improved in accordance with the intersection lane designations identified Figure 5.12-4 of the OMCPU Final PEIR; however, the OMCPU Final PEIR found that 39 of the 49 intersections would remain significantly impacted after mitigation. In addition, the OMCPU Final PEIR found that at the program-level, OMCPU impacts to five SR-905 freeway segments would remain significant and unmitigated. With respect to metered freeway on-ramps, the OMCPU Final PEIR concluded that due to the uncertainty associated with implementing freeway improvements, limitations on increasing ramp capacity, and uncertainty regarding implementation of Transportation Demand Management measures, five freeway ramp impacts associated with the OMCPU would remain significant and unmitigated at the program-level after implementation of mitigation. As such, the OMCPU Final PEIR disclosed that impacts to roadway segments, intersections, and the SR-905 freeway segments and metered on-ramps were significant and unmitigated and a statement of overriding considerations was adopted. (City of San Diego, 2014b, pp. 5.12-17 through 5.12-48)

The OMCPU Final PEIR found that roadway improvements associated with the buildout of the OMCPU would be constructed in accordance with City design standards and applicable OMCPU policies. Therefore, the OMCPU Final PEIR concluded that impacts associated with traffic hazards for

motor vehicles, bicyclists, and pedestrians would be less than significant. (City of San Diego, 2014b, pp. 5.12-48 and 5.12-49)

The OMCPU Final PEIR found that buildout of the OMCPU would not create alterations to present circulation movements in the area, and that no existing public access points would be permanently closed. Therefore, the OMPCU EIR concluded that impacts associated with circulation and access would be less than significant with no mitigation required. (City of San Diego, 2014b, p. 5.12-49)

The OMCPU Final PEIR found that the OMCPU policies would be consistent with the City's General Plan policies supporting alternative transportation modes. Therefore, the OMCPU Final PEIR concluded that there would be no impact and mitigation would not be required. (City of San Diego, 2014b, pp. 5.12-50 through 5.12-52)

Project

In order to evaluate the proposed Project's potential to impact the surrounding circulation network and to determine whether the Project's impacts are within the scope of the OMCPU Final PEIR, a Project-specific Traffic Analysis Memorandum (TAM) was prepared by Chen Ryan Associates, dated January 14, 2021, included as *Appendix G*. Refer to *Appendix G* for a discussion of the methodology used to evaluate the Project's potential traffic impacts.

Minimum Level of Service and Thresholds of Significance

Traffic operations of roadway facilities are described using the term "Level of Service" (LOS). LOS is a quantitative measure describing operational conditions within a traffic stream, and the motorist's and/or passengers' perception of operations. A LOS definition generally describes these conditions in terms of such factors as delay, speed, travel time, freedom to maneuver, interruptions in traffic flow, queuing, comfort, and convenience. Six levels are typically defined ranging from LOS A, representing completely free-flow conditions, to LOS F, representing breakdown in flow resulting in stop-and-go conditions. LOS E represents operations at or near capacity, an unstable level where vehicles are operating with the minimum spacing for maintaining uniform flow.

The definition of an intersection deficiency, roadway deficiency, freeway metered on-ramp deficiency, and freeway segment deficiency has been obtained from the City of San Diego Traffic Impact Study Manual. The City of San Diego Traffic Impact Study Manual states that LOS D is considered acceptable for circulation element roadways within the City. (Chen Ryan, 2021, Attachment 2)

Existing Conditions

The study area for the Lumina II Project includes a total of four existing and future intersections, as shown on Figure 5 of the TAM, where the Project is anticipated to contribute 50 or more peak hour trips or add traffic to a congested location or street segments. Freeway mainline segments were not analyzed since the Project is not expected to add more than 50 peak hour trips in either direction. Figure 6 of the TAM illustrates the study area intersections and identifies the intersection geometrics, and intersection traffic controls.

Existing Traffic Volumes

Due to construction on the roadway segment of Airway Road between Cactus Road and Britannia Boulevard, new traffic counts were not collected on the roadway segment of Cactus Road between Airway Road and Siempre Viva because traffic volumes and patterns are greatly affected by the construction. Therefore, historic counts from the years 2015 and 2019 for the near-by segment of Cactus Road north of Airway Road were utilized to develop a growth factor. As a result, an approximate growth of 100% (from 228 ADT to 478 ADT) was calculated in the area. This growth factor was applied to the 2015 historic counts on the roadway segment of Cactus Road between Airway Road and Siempre Viva Road in order to derive 2019-2020 daily traffic volumes of 4,352 ADT. (Chen Ryan, 2021, p. 11)

Traffic volumes at the intersection of Cactus Road and Siempre Viva Road were also estimated by applying the same approach/methodology described above. Historic counts from the years 2015 and 2019 for the near-by intersection of Cactus Road and Airway Road were utilized to develop a growth factor for both AM and PM peak hours. As a result, an approximate growth of 1% (from 202 total intersection peak hour volumes to 204 total intersection peak hour volumes) was calculated at the intersection during the AM peak hour and an approximate 6% growth (from 292 total intersection peak hour volumes to 310 total intersection peak hour volumes) was calculated at the intersection during the PM peak hour. These growth factors were applied to the 2015 historic counts at the intersection of Cactus Road and Siempre Viva Road in order to derive 2019-2020 volumes. (Chen Ryan, 2021, p. 11)

Figure 5 of the TAM displays estimated existing daily traffic volumes within the study area roadway segment and estimated existing AM and PM peak hour intersection turning movement volumes. Refer to Attachment 1 of the TAM for traffic volume estimation calculations.

Existing Conditions Intersection Level of Service

Existing peak hour traffic LOS have been evaluated for the study area intersections based on the methodologies presented in Attachment 2 of the Project's TAM (*Appendix G*). The intersection LOS results are summarized in Table 5, *Peak Hour Intersection Level of Service for Existing Conditions*, which indicates all of the study area intersections are currently operating at an acceptable LOS during the peak hours. The intersection LOS calculation worksheets are included in Attachment 3 of the Project's TAM. (Chen Ryan, 2021, p. 13)

Existing Conditions Roadway Segment Level of Service

Existing traffic LOS has been evaluated for the study area roadway segment based on the methodologies presented in Attachment 2 of the Project's TAM (*Appendix G*). The roadway segment LOS results are summarized in Table 6, *Roadway Segment Level of Service for Existing Conditions*, which indicates that the study area roadway segment is currently operating at an acceptable LOS. C. (Chen Ryan, 2021, p. 12)

Table 5 Peak Hour Intersection Level of Service for Existing Conditions

#	Intersection	Control Type	AM Peak Hour Avg. Delay (sec)	AM Peak Hour LOS	PM Peak Hour Avg. Delay (sec)	PM Peak Hour LOS
1	Cactus Road / Airway Road	SSSC	9.3	A	10.0	B
2	Cactus Road / Siempre Viva Road	AWSC	7.9	A	8.4	A
3	Cactus Road / Street "C"			DNE		
4	Cactus Road / Central Main Street			DNE		

Source: Chen Ryan Associates, January 2021

Notes:
SSSC = Side-Street Stop Control.
AWSC = All Way Stop Control.
DNE = Does Not Exist.
For SSSC, the delay shown is the worst delay experienced by any of the approaches.
For AWSC, the delay shown is the average delay experienced by all of the approaches.

(Chen Ryan, 2021, Table 3)

Table 6 Roadway Segment Level of Service for Existing Conditions

Roadway	Segment	Functional Classification	LOS Threshold (LOS E)	ADT	V/C	LOS
Cactus Road	Between Airway Road and Siempre Viva Road	2-Lane Collector w/ Commercial Fronting	8,000	4,352*	0.544	C

Source: Chen Ryan Associates, January 2021

Notes:
V/C = Volume to Capacity Ratio.
*Estimated ADT.

(Chen Ryan, 2021, Table 2)

Projected Future Traffic

Proposed Project

Trip generation represents the amount of traffic that is attracted and produced by a development, and is based upon the specific land uses planned for a given project. In order to develop the expected vehicular trip generation of the proposed Project, trip-generation rates published in the City of San Diego Land Development Code – Trip Generation Manual, May 2003 were used. Trip generation for the Project is shown in Table 7, *Project Trip Generation Summary.* (Chen Ryan, 2021, p. 5)

Table 7 Project Trip Generation Summary

Land Use	Units	Trip Rate	ADT	AM Peak Hour %	AM Peak Hour Trips	AM Peak Hour Split	AM Peak Hour In	AM Peak Hour Out	PM Peak Hour %	PM Peak Hour Trips	PM Peak Hour Split	PM Peak Hour In	PM Peak Hour Out
Multi-Family	132	6 / DU	792	8%	64	2:8	13	51	9%	72	7:3	50	22

Source: City of San Diego Land Development Code – Trip Generation Manual, May 2003.

(Chen Ryan, 2021, Table 1)

As shown in Table 7, the Project would generate a total of 792 daily trips, including 64 (13-in /51-out) AM peak hour trips and 72 (50-in / 22-out) PM peak hour trips. (Chen Ryan, 2021, p. 5)

Project Trip Distribution

The Project is anticipated to have an opening year in 2027, which is the same project Opening Day (Year 2027) utilized in the Otay Mesa Lumina Transportation Impact Study, February 2019. Thus, the project trip distribution utilized in the Otay Mesa Lumina Transportation Impact Study was employed for the analysis of Otay Mesa Lumina II. Figure 3 of the TAM displays the Project trip distribution patterns associated with the Project. (Chen Ryan, 2021, p. 5)

Project Trip Assignment

Based upon the Project trip distribution patterns, the daily and AM/PM peak hour Project trips were assigned to the study area roadway network. Figure 4 of the TAM shows the assignment of Project trips to the roadway network and intersections, while Figure 9 of the TAM displays the assignment of Project trips to the study area roadway network under full development of the Project. (Chen Ryan, 2021, p. 5)

Cumulative Development

The CEQA guidelines require that other reasonably foreseeable projects in the study area also be included as part of a cumulative analysis scenario. The same cumulative projects (Year 2027) utilized in the Otay Mesa Lumina Transportation Impact Study, February 2019, were included for the analysis of Otay Mesa Lumina II, with the addition of six (6) projects. (Chen Ryan, 2021, p. 17)

Table 8, *Cumulative Projects Trip Generation*, displays trip generation for the cumulative projects described above. Trip distribution and trip assignment for the cumulative projects was obtained from the Otay Mesa Lumina Transportation Impact Study, February 2019. Project information for the additional six projects listed above is included in Attachment 5 of the Project's TAM (*Appendix G)*. (Chen Ryan, 2021, pp. 17-18)

Existing Plus Project (E+P) Conditions

This subsection provides an analysis of existing traffic conditions with the addition of Project trips from full development of the proposed Project. Under this scenario, the proposed Project's traffic volumes are added to the existing traffic volumes and roadway configuration, and impacts are assessed. The analysis of the Project's potential impacts as measured against the existing conditions baseline that follows is presented for information purposes only. The identification of the Project's significant impacts, with recommended mitigation, will instead be based on the future year analyses that take into account cumulative traffic growth, as well as the changing roadway network and land uses that accompany a long-range development project such as the CVSP. This methodology is appropriate for the proposed Project because the Project would not produce any traffic until buildout and occupancy of the development in 2027, and no traffic would be produced by the Project prior to 2027.

Table 8 Cumulative Projects Trip Generation

	Cumulative Project	Land Use	Daily Trips	AM Peak Hour (In / Out)	PM Peak Hour (In / Out)
1.	7-Eleven – Otay Mesa Road / Ocean View Hills Parkway (PTS#540084)	Convenience Store	1,800	144 (72-in / 72-out)	144 (72-in / 72-out)
2.	Azul Playa Del Sol/Luna (California Terraces PA 6)	Residential	4,440	356 (71-in / 285-out)	400 (280-in / 120-out)
3.	Candlelight (PTS#40329)	Residential	2,850	228 (46-in / 182-out)	257 (180-in / 77-out)
4.	Southview (PTS#370044)	Residential	1,662	133 (27-in / 106-out)	299 (105-in / 194-out)
5.	Southview East (PTS#371807)	Residential	816	65 (13-in / 52-out)	220 (51-in / 169-out)
6.	Southwind (PTS#412529)	Residential	800	64 (13-in / 51-out)	80 (56-in / 24-out)
7.	Handler Site[1] (PTS#659064)	Motel	1,701	136 (54-in / 82-out)	153 (61-in / 92-out)
		Restaurant (sit down high turnover)	3,120	250 (125-in / 125-out)	250 (150-in / 100-out)
		Fast food (with drive-through)	4,200	168 (101-in / 67-out)	336 (168-in / 168-out)
8.	Arco #5770	Gas Station	60	4 (2-in / 2-out)	4 (2-in / 2-out)
9.	Marijuana Production Facility (PTS#585510)	Marijuana Facility	346	69 (62-in / 7-out)	69 (14-in / 55-out)
10.	California Terraces PA 61 (PTS#605191)	Mixed-use Residential/Commercial	4,716	252 (101-in / 151-out)	486 (271-in / 215-out)
11.	Cross Border Facility (Full Buildout) (PTS#473500)	Cross Border Facility	46,700	2,313 (1,505-in / 808-out)	2,547 (1,115-in / 1,431-out)
12.	Metro Airpark Site[2] (PTS#559378)	Airport / Retail	24,760	2,695 (2,116-in / 579-out)	2,780 (710-in / 2,070-out)
13.	Plaza La Media (Full Buildout) (PTS#334235)	Commercial/Retail	8,660	310 (183-in / 127-out)	812 (407-in / 405-out)
14.	Sunroad Otay Mesa (Phase 1 and Phase 2) (PTS#538140)	Warehouse	4,225	633 (444-in / 189-out)	676 (270-in / 406-out)
15.	Otay Mesa Lumina[3] (PTS#555609)	Mixed-Use Residential/Commercial	15,581	1,214 (390-in / 824-out)	1,532 (944-in / 588-out)

Table 8 Cumulative Projects Trip Generation (Cont.)

Cumulative Project	Land Use	Daily Trips	AM Peak Hour (In / Out)	PM Peak Hour (In / Out)
16. Otay Mesa Lumina III[4] (PTS#651806)	Residential	200	16 (3-in / 13-out)	20 (14-in / 6-out)
17. Otay Mesa Floreo[5] (PTS#620164)	Mixed-Use Residential/Commercial	6,275	460 (103-in / 357-out)	570 (382-in / 188-out)
18. Southwest Village[6] (PTS#614791)	Mixed-Use Residential/Commercial	45,050	3,188 (904-in / 2,284-out)	4,270 (2,631-in / 1,639-out)
19. Plaza La Media South[7] (PTS#632813)	Warehouse	2,186	328 (230-in / 98-out)	350 (139-in / 211-out)
20. Warehouse Distribution Center[8] (PTS#665589)	Warehouse / Office	1,297	195 (140-in / 55-out)	206 (77-in / 129-out)
	Cumulative Total	**180,898**	**13,251 (6,705-in / 6,546-out)**	**16,521 (8,162-in / 8,421-out)**

Source: Chen Ryan Associates, January 2021

Notes:
[1] Handler Site is currently under review for CPA/RZ to 560 DU plus 7,500 sq.ft. of commercial under PTS#673818.
[2] Metro Airpark Site is currently under review for different SCR under PTS#664354.
[3] Trip Generation obtained from Otay Mesa Lumina TIS prepared by Chen Ryan Associates, Inc. February 20, 2019.
[4] Trip Generation obtained from Otay Mesa Lumina III Draft TIS prepared by Chen Ryan Associates, Inc. February 20, 2020 (under review).
[5] Trip Generation obtained from the Draft Otay Mesa Floreo TIS prepared by Chen Ryan Associates, Inc. June 6, 2019. (under review).
[6] Trip Generation obtained from City of San Diego Land Development Code – Trip Generation Manual, May 2003.
[7] Trip Generation obtained from Plaza La Media South Traffic Sensitivity Analysis (TSA) prepared by Kimley-Horn Associates, Inc. February 2020. (under review)
[8] Trip Generation obtained from City of San Diego DSD staff.

(Chen Ryan, 2021, Table 6)

Roadway Improvements E+P Conditions

The lane configurations and traffic controls assumed to be in place for E+P conditions are largely identical with Existing conditions, except that it is assumed that Project driveways and those facilities constructed by the Project to provide site access would be in place for E+P conditions (e.g., intersection and roadway improvements at the Project's frontage and driveways). (Chen Ryan, 2021, p. 13)

E+P Traffic Volume Forecasts

This scenario includes Existing traffic volumes plus Project traffic. Figure 7 of the Project's TAM (*Appendix G*) shows the ADT volumes and peak hour intersection turning movement volumes that can be expected for E+P traffic conditions. (Chen Ryan, 2021, p. 14)
Intersection Level of Service – E+P Traffic Conditions

E+P peak hour traffic LOS has been evaluated for the study area intersections based on the methodologies presented in Attachment 2 of the Project's TIS (*Appendix G*). The intersection LOS results are summarized in Table 9, *Intersection Level of Service for E+P Conditions*, which indicate that

Table 9 Intersection Level of Service for E+P Conditions

#	Intersection	Control Type	AM Peak Hour Avg. Delay (sec)	AM Peak Hour LOS	PM Peak Hour Avg. Delay (sec)	PM Peak Hour LOS	Delay w/o Project (sec) AM/PM	LOS w/o Project AM/PM	Change in Delay (sec) AM/PM	SI?
1	Cactus Road / Airway Road	SSSC	9.6	A	10.6	B	9.3 / 10.0	A / B	0.3 / 0.3	N
2	Cactus Road / Siempre Viva Road	AWSC	7.9	A	8.4	A	7.9 / 8.4	A / A	0.0 / 0.0	N
3	Cactus Road / Street "C"	AWSC	8.2	A	9.4	A	DNE	DNE	-	N
4	Cactus Road / Central Main Street	DNE					N/A	N/A	N/A	N/A

Source: Chen Ryan Associates, January 2021

Notes:
SSSC = Side-Street Stop Control.
AWSC = All Way Stop Control.
DNE = Does Not Exist.
N/A = Not Applicable.
For SSSC, the delay shown is the worst delay experienced by any of the approaches.
For AWSC, the delay shown is the average delay experienced by all of the approaches.

(Chen Ryan, 2021, Table 5)

none of the study area intersections are anticipated to operate at an unacceptable LOS with the addition of Project traffic under Existing Plus Project conditions. The intersection LOS calculation worksheets are included in Attachment 4 of the Project's TAM. (Chen Ryan, 2021, p. 17)

Roadway Segment Level of Service – E+P Traffic Conditions

E+P roadway segment LOS has been evaluated for the study area roadway segments based on the methodologies presented in Attachment 2 of the Project's TIS (*Appendix G*). The roadway segment LOS results are summarized in Table 10, *Roadway Segment Level of Service for E+P Conditions,* which indicate that the none of the study area street segments are anticipated to operate at an unacceptable LOS with the addition of Project traffic under Existing Plus Project conditions. (Chen Ryan, 2021, p. 16)

Near-Term Plus Project (Opening Day) 2027 Conditions

This subsection provides an analysis of the Near-Term (Opening Day) 2027 traffic conditions with the addition of the Lumina II Project. (Chen Ryan, 2021, p. 26)

Roadway Improvements Near-Term Plus Project (Opening Day) 2027) Conditions

The lane configurations and traffic controls assumed to be in place for Near-Term 2027 conditions are largely identical with Existing conditions, except that it is assumed that Project driveways and those facilities constructed by the Project to provide site access are also assumed to be in place for Near-Term 2027 conditions (e.g., intersection and roadway improvements at the Project's frontage and driveways). Facilities constructed by the Project that would be place for Near-Term 2027 conditions include improvement Cactus Road along the Project's frontage to a 3-lane Major (two lanes southbound, one lane northbound with 16-foot raised median); Street "C" along the Project's frontage to a 2-lane Collector (one westbound land and one eastbound lane); and construction of an

Table 10 Roadway Segment Level of Service for E+P Conditions

Roadway	Segment	Functional Classification	LOS Threshold (LOS E)	ADT	V/C	LOS	V/C w/o Project	LOS w/o Project	ΔV/C	SI?
Cactus Road	Between Airway and Street "C"	2-Lane Collector w/ Commercial Fronting	8,000	5,128	0.641	D	0.544	B	0.097	N
Cactus Road	Between Street "C" and southern property boundary	3-Ln w / RM (1NB, 2 SB)	30,000[1]	4,368	0.145	A	0.544	B	-0.399	N
Cactus Road	Between southern property boundary and Siempre Viva Road	2-Lane Collector w/ Commercial Fronting	8,000	4,368	0.546	C	0.544	B	0.002	N
Street "C"	Between Village Way and Cactus Road	2-Lane Collector (multi-family)[2]	8,000	792	0.100	A	0.544	N/A	N/A	N

Source: Chen Ryan Associates, January 2021

Notes:
V/C = Volume to Capacity Ratio.
SI? = Significant Impact?
[1] Based on the capacity of a 4-Lane Major Arterial, reduced to exclude a lane. (3/4*40,000 = 30,000).
[2] Consistent with roadway classification included in the Otay Mesa Lumina TIS, February 20, 2019.

(Chen Ryan, 2021, Table 4)

all-way stop controlled T-intersection with an additional southbound through lane at the Project frontage at the intersection of Cactus Road and Street "C". (Chen Ryan, 2021, pp. 1-2, 26)

Near-Term Plus Project (Opening Day) 2027 Traffic Volume Forecasts

This scenario includes Existing traffic volumes plus cumulative development traffic volumes plus Near-Term (Opening Day) 2027 Project traffic.

Figure 11 of the TAM displays Near-Term Year (Opening Day) 2027 traffic volumes. (Chen Ryan, 2021, p. 26)

Intersection Level of Service – Near-Term Plus Project (Opening Day) 2027 Traffic Conditions

Near-Term 2027 Plus Project (Opening Day) peak hour traffic LOS has been evaluated for the study area intersections based on the methodologies presented in Attachment 2 of the Project's TAM (*Appendix G*). The intersection LOS results are summarized in Table 11, *Intersection Level of Service for Near-Term Plus Project (Opening Day) 2027 Conditions*, which indicate that the following intersection is anticipated to operate at an unacceptable LOS with the addition of Project traffic under (Opening Day) 2027 conditions.

Impacts to the following intersections would be significant and mitigation would be required. The intersection LOS Synchro worksheets are included in Attachment 7 of the Project's TAM. (Chen Ryan, 2021, p. 29)

- Cactus Road / Airway Road – LOS F during both the AM and PM peak hours.

Table 11 Intersection Level of Service for Near-Term Plus Project (Opening Day) 2027 Conditions

#	Intersection	Control Type	AM Peak Hour Avg. Delay (sec)	AM Peak Hour LOS	PM Peak Hour Avg. Delay (sec)	PM Peak Hour LOS	Delay w/o Project (sec) AM/PM	LOS w/o Project AM/PM	Change in Delay (sec) AM/PM	SI?
1	Cactus Road / Airway Road	SSSC	279.6	F	N/A[1]	F	222.2 / N/A[1]	F / F	57.4 / N/A	Y
2	Cactus Road / Siempre Viva Road	AWSC	8.1	A	8.4	A	8.1 / 8.4	A / A	0.0 / 0.0	N
3	Cactus Road / Street "C"	AWSC	9.9	A	11.5	B	9.3 / 11.0	A / B	0.6 / 0.5	N
4	Cactus Road / Central Main Street	AWSC	11.9	B	17.2	C	11.0 / 15.7	B / B	0.9 / 1.5	N

Source: Chen Ryan Associates, January 2021

Notes:
SSSC = Side-Street Stop Control.
AWSC = All Way Stop Control.
DNE = Does not exist.
SI? = Significant Impact?
For SSSC, the delay shown is the worst delay experienced by any of the approaches.
For AWSC, the delay shown is the average delay experienced by all of the approaches.
[1] Exceeds maximum reasonable calculable delay of 600 seconds per Synchro 10.0 traffic analysis software.

(Chen Ryan, 2021, Table 10)

Roadway Segment Level of Service – Near-Term Plus Project (Opening Day) 2027 Traffic Conditions

Near-Term 2027 Plus Project (Opening Day) roadway segment LOS has been evaluated for the study area roadway segments based on the methodologies presented in Attachment 2 of the Project's TAM (*Appendix G*). The roadway segment LOS results are summarized in Table 12, *Roadway Segment Level of Service for Near-Term Plus Project (Opening Day) 2027 Conditions,* which indicate that the following roadway segments are anticipated to operate at an unacceptable LOS with the addition of Project traffic under Near-Term 2027 Plus Project (Opening Day) conditions.

Impacts to the following road segments would be significant and mitigation would be required. (Chen Ryan, 2021, p. 28)

- Cactus Road, between Airway Road and Central Main Street – LOS F; and
- Cactus Road, between Central Main Street and Street "C" – LOS F.

Buildout of Community Plan Plus Project Conditions

This subsection provides a summary of the expected Buildout of Community Plan cumulative traffic conditions with the addition of the Lumina II Project. (Chen Ryan, 2021, p. 32)

Roadway Improvements Buildout of Community Plan Plus Project Conditions

The lane configurations and traffic controls assumed to be in place for Buildout of Community Plan Plus Project conditions are the same assumptions utilized in the Otay Mesa Lumina Transportation Impact Study, February 2019. It is assumed that Project driveways and those facilities constructed by

Table 12 Roadway Segment Level of Service for Near-Term Plus Project (Opening Day) 2027 Conditions

Roadway	Segment	Functional Classification	LOS Threshold (LOS E)	ADT	V/C	LOS	V/C w/o Project	LOS w/o Project	ΔV/C	SI?
Cactus Road	Between Airway Road and Central Main Street	2-Lane Collector w/ Commercial Fronting	8,000	11,683	1.454	F	1.363	F	0.091	Y
Cactus Road	Between Central Main Street and Street "C"	2-Lane Collector w/ Commercial Fronting	8,000	8,435	1.054	F	0.957	E	0.097	Y
Cactus Road	Between Street "C" and southern property boundary	3-Ln w / RM (1NB, 2 SB)	30,000[1]	4,810	0.160	A	0.600	C	-0.440	N
Cactus Road	Between southern property boundary and Siempre Viva Road	2-Lane Collector w/ Commercial Fronting	8,000	4,810	0.601	C	0.600	C	0.001	N
Street "C"	Between Village Way and Cactus Road	2-Lane Collector (multi-family)[2]	8,000	3,892	0.487	B	0.388	B	0.100	N

Source: Chen Ryan Associates, January 2021

Notes:
Bold letter indicates substandard LOS.
V/C = Volume to Capacity Ratio.
SI? = Significant Impact?
[1] Based on the capacity of a 4-Lane Major Arterial, reduced to exclude a lane. (3/4*40,000 = 30,000).
[2] Consistent with roadway classification included in the Otay Mesa Lumina TIS, February 20, 2019.

(Chen Ryan, 2021, Table 9)

the Project to provide site access are in place for Buildout of Community Plan Plus Project conditions (e.g., intersection and roadway improvements at the Project's frontage and driveways). (Chen Ryan, 2021, p. 30)

Buildout of Community Plan Plus Project Traffic Volume Forecasts

The same roadway and intersection volumes utilized in the Otay Mesa Lumina Transportation Impact Study, February 2019, were employed for the analysis of the proposed Otay Mesa Lumina II Project. This scenario includes buildout of the Otay Mesa Community Plan cumulative traffic conditions plus Project traffic. (Chen Ryan, 2021, p. 30)

Intersection Level of Service – Buildout of Community Plan Plus Project Traffic Conditions

Buildout of Community Plan Plus Project peak hour LOS has been evaluated for the study area intersections based on the methodologies presented in Attachment 2 of the Project's TAM (*Appendix G*). The intersection LOS results are summarized in Table 13, *Intersection Level of Service for Buildout of the Community Plan Plus Project Conditions*, which indicate the following intersections are anticipated to operate at an unacceptable LOS under Buildout Plus Project conditions and also would be significantly impacted with the addition of Project traffic. The intersection LOS Synchro worksheets are included in Attachment 9 of the Project's TAM. (Chen Ryan, 2021, p. 33)

Table 13 Intersection Level of Service for Buildout of the Community Plan Plus Project Conditions

#	Intersection	Control Type	AM Peak Hour Avg. Delay (sec)	AM Peak Hour LOS	PM Peak Hour Avg. Delay (sec)	PM Peak Hour LOS	Delay w/o Project (sec) AM/PM	LOS w/o Project AM/PM	Change in Delay (sec) AM/PM	SI?
1	Cactus Road / Airway Road	Signal	358.3	F	402.4	F	357.5 / 396.3	F / F	0.8 / 6.1	Y
2	Cactus Road / Siempre Viva Road	Signal	424.5	F	511.3	F	423.0 / 508.5	F / F	1.5 / 2.8	Y
3	Cactus Road / Street "C"	AWSC	N/A[1]	F	N/A[1]	F	578.8 / N/A[1]	F / F	31.8 / 11.0	Y
4	Cactus Road / Central Main Street	AWSC	N/A[1]	F	N/A[1]	F	N/A[1] / N/A[1]	F / F	19.8 / 11.3	Y

Source: Chen Ryan Associates, January 2021

Notes:
SSSC = Side-Street Stop Control.
AWSC = All Way Stop Control.
DNE = Does not exist.
SI? = Significant Impact?
For SSSC, the delay shown is the worst delay experienced by any of the approaches.
For AWSC, the delay shown is the average delay experienced by all of the approaches.
[1] Exceeds maximum reasonable calculable delay of 600 seconds per Synchro 10.0 traffic analysis software.

(Chen Ryan, 2021, Table 14)

- Cactus Road / Airway Road (Intersection #1) – LOS F during the AM and PM peak hours;
- Cactus Road / Siempre Viva Road (Intersection #2) – LOS F during the AM and PM peak hours;
- Cactus Road / Street "C" (Intersection #3) – LOS F during the AM and PM peak hours;
- Cactus Road / Central Main Street (Intersection #4) – LOS F during the AM and PM peak hours.

Although impacts to the above-listed intersections would be significant and unavoidable under Buildout of Community Plan Plus Project conditions, the impacts identified above are consistent with those identified by the OMCPU Final PEIR. Additionally, because the Project would produce less traffic than was assumed by the OMCPU Final PEIR, impacts to the above-listed intersections would be less than was disclosed by the OMCPU Final PEIR. As such, the Project would not result in any new or more severe impacts to study area intersections as compared to what was evaluated and disclosed by the OMCPU Final PEIR.

Roadway Segment Level of Service – Buildout of Community Plan Plus Project Traffic Conditions

Buildout of Community Plan Plus Project roadway segment LOS has been evaluated for the study area roadway segments based on the methodologies presented in Attachment 2 of the Project's TAM (*Appendix G*). The roadway segment LOS results are summarized in Table 14, *Roadway Segment Level of Service Buildout of the Community Plan Plus Project Conditions,* which indicate that the following roadway segments are anticipated to operate at an unacceptable LOS and also would be significantly impacted with the addition of Project traffic. (Chen Ryan, 2021, p. 32)

- Cactus Road, between Airway Road and Central Main Street – LOS E;
- Cactus Road, between Central Main Street and Street "C" – LOS E;
- Cactus Road, between Street "C" and southern property boundary – LOS E
- Cactus Road, between southern property boundary and Siempre Viva Road – LOS E; and

Table 14 Roadway Segment Level of Service Buildout of the Community Plan Plus Project Conditions

Roadway	Segment	Functional Classification	LOS Threshold (LOS E)	ADT	V/C	LOS	V/C w/o Project	LOS w/o Project	ΔV/C	SI?
Cactus Road	Between Airway Road and Central Main Street	4-Lane Major Arterial	40,000	38,960	0.974	E	0.955	E	0.019	N
Cactus Road	Between Central Main Street and Street "C"	4-Lane Major Arterial	40,000	38,960	0.974	E	0.955	E	0.019	N
Cactus Road	Between Street "C" and southern property boundary	4-Lane Major Arterial	40,000	38,960	0.974	E	0.955	E	0.019	N
Cactus Road	Between southern property boundary and Siempre Viva Road	4-Lane Major Arterial	40,000	38,960	0.974	E	0.972	E	0.002	N
Street "C"	Between Village Way and Cactus Road	2-Lane Collector (multi-family)[1]	8,000	3,892	0.487	B	0.388	B	0.100	N

Source: Chen Ryan Associates, January 2021

Notes:
Bold letter indicates substandard LOS.
V/C = Volume to Capacity Ratio.
SI? = Significant Impact?
[1] Consistent with roadway classification included in the Otay Mesa Lumina TIS, February 20, 2019.

(Chen Ryan, 2021, Table 13)

- Street "C", between Village Way and Cactus Road – LOS E.

Although impacts to the above-listed roadway segments would be significant and unavoidable under Buildout of Community Plan Plus Project conditions, the impacts identified above are consistent with impacts identified by the OMCPU Final PEIR. Additionally, the proposed Project would produce less traffic than was anticipated by the OMCPU Final PEIR, and therefore impacts to the above-listed roadway segments would be less than was evaluated in the OMCPU Final PEIR. As such, the Project would not result in any new or more severe impacts to study area roadway segments as compared to what was evaluated and disclosed by the OMCPU Final PEIR.

Project Mitigation

Subsection 3.10, *Phasing*, of the CVSP requires all future development projects within the CVSP to prepare a project-level traffic study to identify the transportation and circulation improvements needed to ensure that Project impacted transportation facilities operate at acceptable levels of service, and to determine whether each development would result in new significant and unavoidable traffic impacts not identified by the OMCPU Final PEIR. In accordance with Section 3.10 of the CVSP, the Project's TAM (*Appendix G*) identifies improvements needed to ensure that Project impacts to the transportation facilities as identified herein are mitigated to the maximum feasible extent. The Project's recommended improvements to mitigate for the above-described Project-specific impacts are included as Project-specific Mitigation Measures MM-7 through MM-13 in this document.

As demonstrated below, with implementation of the recommended improvements included in the TAM, near-term direct impacts would be reduced to less-than-significant levels and Community Plan

Buildout Project impacts would be within the scope of analysis of the OMCPU Final PEIR and would be slightly reduced in comparison to what was evaluated and disclosed by the OMCPU Final PEIR due to the approximately 7% reduction in traffic associated with the Project as compared to what was assumed for the site by the OMCPU Final PEIR (City of San Diego, 2017) .

The Project would implement Mitigation Measures MM-7 through MM-13, as detailed in the MMRP, to reduce impacts related to transportation to a less than significant level. This mitigation measures would be consistent with OMCPU Final PEIR Mitigation Framework Measure TRF-1. Furthermore, future development on-site would be required to comply with OMCPU Final PEIR Mitigation Framework TRF-1. Provided below is a summary of the significance of the Project's impacts to transportation and traffic following implementation of Project-specific Mitigation Measures MM-7 through MM-13 for each phase of the proposed Project.

Near-Term Year Plus Project (Opening Day) 2027

Intersection Level of Service – Near-Term Plus Project (Opening Day) 2027

As shown in Table 15, *Intersection Level of Service for Near-Term Plus Project (Opening Day) 2027 Conditions with Mitigation*, with implementation of Project-specific Mitigation Measure MM-7, the intersection of Cactus Road and Airway Road (Intersection #1) would operate at an acceptable LOS B during the AM peak hour and LOS D during the PM peak hour under Near-Term Year Plus Project (Opening Day) 2027 conditions and impacts would be reduced to a level below significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU Final PEIR. (Chen Ryan, 2021, p. 35)

Table 15 Intersection Level of Service for Near-Term Plus Project (Opening Day) 2027 Conditions with Mitigation

		Before Mitigation Measures				After Mitigation Measures			
		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
#	Intersection	Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS
1	Cactus Road / Airway Road	279.6	F	N/A[1]	F	11.4	B	43.0	D

Source: Chen Ryan Associates, January 2021

Notes:
Bold letter indicates substandard LOS.
[1] Exceeds maximum reasonable calculable delay of 600 seconds per Synchro 10.0 traffic analysis software.

(Chen Ryan, 2021, Table 16)

Roadway Segment Level of Service– Near-Term Year Plus Project (Opening Day) 2027

As shown in Table 16, *Roadway Segment Level of Service for Near-Term Year Plus Project (Opening Day) 2027 Conditions with Mitigation,* with implementation of Project-specific Mitigation Measures MM-8 and MM-9, the roadway segments of Cactus Road between Airway Road to Central Main Street and Cactus Road between Central Main Street to Street "C" would operate at an acceptable LOS B and A,

Table 16 Roadway Segment Level of Service for Near-Term Year Plus Project (Opening Day) 2027 Conditions with Mitigation

		Before Mitigation Measures			After Mitigation Measures		
Roadway	Segment	ADT	Cross-Section	LOS	ADT	Cross-Section[1]	LOS
Cactus Road	Airway Road to Central Main Street	11,683	2-Ln	**F**	11,683	3-Ln w/RM	B
Cactus Road	Central Main Street to Street "C"	8,435	2-Ln	F	8,435	3-Ln w/RM	A

Source: Chen Ryan Associates, January 2021

Notes:
Bold letter indicates substandard LOS.
[1] 2 lanes SB and 1 lane NB with LOS E capacity assumed of 30,000 ADT.

(Chen Ryan, 2021, Table 15)

respectively, under Near-Term Year Plus Project (Opening Day) 2027 conditions and impacts would be reduced to a level below significant. Therefore, implementation of the Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU Final PEIR. (Chen Ryan, 2021, p. 34)

Buildout of Community Plan Plus Project

Intersection Level of Service – Buildout of Community Plan Plus Project

As shown in Table 17, *Intersection Level of Service for Buildout of the Community Plan Plus Project Conditions with Mitigation*, with implementation of Project-specific Mitigation Measures MM-10 and MM-11, the following intersections would operate at an acceptable LOS. Although the intersections listed below were not specifically analyzed in OMCPU Final PEIR, the OMCPU Final PEIR determined that all studied intersections along the length of Cactus Road, including intersections along segments both north and south of Intersections #3 and #4 would operate at a deficient LOS when considering future year traffic volumes. In addition, the OMCPU Final PEIR and the transportation impact study appended to the OMCPU Final PEIR (OMCPU PEIR Appendix J) contained diagrams that disclosed the expected future year traffic volumes along Cactus Road. With implementation of the improvements identified in Mitigation Measures MM-10 and MM-11, Intersections #3 and #4, respectively, the following intersections would operate at an acceptable LOS; however, consistent with the findings of the OMCPU Final PEIR, the Project's impacts to the following intersections would be considered significant and unavoidable until the improvements listed in Mitigation Measures MM-10 and MM-11 are in place. Accordingly, because the Project's impact would be consistent with what was disclosed by the OMCPU Final PEIR, the Project would not cause or substantially contribute to a new impact that was not previously disclosed in the OMCPU Final PEIR.

- Cactus Road / Street "C" (Intersection #3)
- Cactus Road / Central Main Street (Intersection #4)

As shown in Table 17, with implementation of Project-specific Mitigation Measures MM-10 and MM-11, the following intersections would continue to operate at a deficient LOS under OMCPU buildout conditions. Accordingly, because the Project's impact would be consistent with what as disclosed by the OMCPU Final PEIR, the Project would not cause or substantially contribute to a new impact that

Table 17 Intersection Level of Service for Buildout of the Community Plan Plus Project Conditions with Mitigation

		Before Mitigation Measures				After Mitigation Measures			
		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
#	Intersection	Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS
1	Cactus Road / Airway Road	358.3	F	402.4	F	175.0	F	250.8	F
2	Cactus Road / Siempre Viva Road	424.5	F	511.3	F	405.8	F	462.3	F
3	Cactus Road / Street "C"	N/A[1]	F	N/A[1]	F	18.0	B	17.1	B
4	Cactus Road / Central Main Street	N/A[1]	F	N/A[1]	F	38.8	D	17.8	B

Source: Chen Ryan Associates, January 2021

Notes:
Bold letter indicates substandard LOS.
[1] Exceeds maximum reasonable calculable delay of 600 seconds per Synchro 10.0 traffic analysis software.
(Chen Ryan, 2021, Table 17)

was not previously disclosed in the OMCPU Final PEIR. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU Final PEIR. (Chen Ryan, 2021, p. 37)

- Cactus Road / Airway Road (Intersection #1)
- Cactus Road / Siempre Viva Road (Intersection #2)

Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU Final PEIR. (Chen Ryan, 2021, p. 37)

Roadway Segment Level of Service – Buildout of Community Plan Plus Project (Full Development)

As previously shown in Table 14, all of the study area roadway segments would operate at an acceptable LOS under Buildout of Community Plan Plus Project conditions and no mitigation is required. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU Final PEIR. (Chen Ryan, 2021, p. 36)

Traffic Hazards

Consistent with the findings of the OMCPU Final PEIR, all roadway and intersection improvements proposed as part of the Project would be constructed in accordance with City design standards. The Project is fully consistent with the CVSP, which accommodates both vehicular and non-vehicular traffic in a manner that would not result in hazards. For example, the Project would construct a Class II bike lane along the Project site's frontage on Cactus Road. Furthermore, and consistent with the CVSP, the Project would be required to provide a standard sidewalk, pedestrian paseos, and trails designed to separate pedestrian traffic from vehicular traffic to the maximum feasible extent.

There are no components of the Project that would result in increased traffic hazards for motor vehicles, bicyclists, or pedestrians beyond what was evaluated and disclosed as part of the OMCPU Final PEIR and Addendum No. 408329 prepared for the CVSP. Accordingly, and consistent with the findings of the OMCPU Final PEIR, impacts would be less than significant.

Alterations to Circulation System and Emergency Access

Development of the Project would result in alterations to the existing circulation system through intersection and roadway improvements. Buildout of the Project would result in increased circulation capacity and access for vehicles, bicycles, and pedestrians. Consistent with the findings of the OMCPU Final PEIR, the Project may result in temporary closures with detours during construction of street improvements. Any temporary closures would be addressed through traffic control plans prepared by the Project Applicant and approved by the City Engineer as future construction plans are processed through the City, and this requirement would be implemented by a standard City condition of approval that would apply to the Project. Furthermore, emergency access would be provided during all construction phases. No existing public access points would be permanently closed as part of Project implementation. Accordingly, and consistent with the finding of the OMCPU Final PEIR, the Project would have a less-than-significant impact associated with altering circulation and emergency access on the Project site.

Alternative Transportation

The Project would implement the goals and policies of the OMCPU and CVSP with respect to alternative modes of transportation. Consistent with the CVSP, which was adopted to implement the OMCPU, the Project would be required to provide sidewalks, pedestrian paseos, and trails in accordance with the CVSP. Additionally, the Project's future Neighborhood Development Permit applications, which are required by the CVSP, would be reviewed by the City for conformance with applicable goals and policies of the General Plan, OMCPU, CVSP, and all applicable ordinances, policies, and plans related to alternative transportation modes. Finally, the future site-specific discretionary actions associated with the buildout of the Project would be conditioned to comply with the design standards and policies in the CVSP's Mobility Element (Section 2.3), which support alternative transportation modes, and are in conformance with the adopted plans, policies, and programs supporting alternative transportation modes. Thus, the Project would comply with adopted policies, plans, and programs supporting alternative transportation modes, and a less-than-significant impact would occur. Accordingly, and consistent with the finding of the OMCPU Final PEIR, the Project would have no impact associated with a conflict with an applicable plan, policy, or program supporting alternative transportation modes nor would the Project otherwise decrease the performance or safety of such facilities. Therefore, implementation of the Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU Final PEIR.

CEQA Guideline § 15064.3(b) (Vehicle Miles Travelled)

CEQA Guidelines § 15064.3(b) includes specific considerations for evaluating a project's transportation impacts using a VMT measure, instead of evaluating impacts based on LOS criteria, as required by California Senate Bill (SB) 743. LOS has been used as the basis for determining the significance of traffic impacts as standard practice in CEQA documents for decades, including at the

time the OMCPU Final PEIR was certified in 2014. In 2013, SB 743 was passed, which is intended to balance the need for LOS for traffic planning with the need to build infill housing and mixed-use commercial developments within walking distance of mass transit facilities, downtowns, and town centers, and to provide greater flexibility to local governments to balance these sometimes-competing needs. In January 2019, the Natural Resources Agency finalized updates to the CEQA Guidelines including the incorporation of the SB 743 modifications. The Guidelines changes were approved by the Office of Administrative Law and are now in effect. As such, as of July 1, 2020, LOS can no longer be the basis for determining an environmental effect under CEQA, and the analysis of impacts to transportation is now based on VMTs.

However, CEQA Guidelines § 15064.3(c) is clear that "[t]he provisions of [§ 15064.3] shall apply prospectively as described in [CEQA Guidelines] section 15007." CEQA Guidelines § 15007(c) specifically states: "[i]f a document meets the content requirements in effect when the document is sent out for public review, the document shall not need to be revised to conform to any new content requirements in Guideline amendments taking effect before the document is finally approved." As noted above, the Guidelines changes with respect to VMTs took effect on July 1, 2020, while the OMCPU Final PEIR was certified in 2014. As such, and in accordance with CEQA Guidelines §§ 15064.3(c) and 15007(c), revisions to the OMCPU Final PEIR are not required under CEQA in order to conform to the new requirements established by CEQA Guidelines § 15064.3.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the PEIR occur.

PUBLIC SERVICES

OMCPU Final PEIR

The OMCPU Final PEIR found that buildout of the OMCPU would increase the demand for all public services, including fire protection, police protection, schools, parks, and other public facilities, and would result in the need for the construction and operation of new public facilities. The OMCPU Final PEIR found that future development projects associated with new public facilities would be subject to separate environmental review and payment of applicable fees. Therefore, the OMCPU Final PEIR concluded that at the program level of analysis used to construct and operate public service facilities, impacts related to the construction of new public facilities, including fire protection, police protection, schools, parks, and other public facilities, would be less than significant. (City of San Diego, 2014b, pp. 5.13-20 through 5.13-30)

Project

The Project proposes the future development of up to 132 multi-family dwelling units. As noted in the OMCPU Final PEIR, buildout of the OMCPU, including the Project, would increase demand for all public facilities. The Project's impacts on public services, including fire protection, police protection, schools, parks, and other public facilities, are discussed below.

Fire Protection

Buildout of the Project would increase demand for fire protection and would contribute to the need for new or altered facilities. The OMCPU Final PEIR disclosed that under existing conditions, fire services in the Project area currently are provided by Fire Station No. 29, located approximately 6.4 roadway miles to the west of the Project site. As noted in the OMCPU Final PEIR, one new firefighter is needed for every 1,000 persons. Buildout of the Project would result in a future population of 456 residents, which would result in the need for approximately 0.5 new firefighters (456 residents /1,000 persons = 0.5 firefighters). However, and as noted in Addendum No. 408329, buildout of the CVSP, including the Project, would result in fewer residents than was assumed for the site as part of the OMCPU Final PEIR; thus, the Project would result in decreased demand for fire protection services as compared to what was evaluated and disclosed as part of the OMCPU Final PEIR. (City of San Diego, 2014b, p. 5.13-21)

The OMCPU Final PEIR also notes that there are two new fire stations planned to serve the OMCPU area. A new fire station (No. 49) is planned at the northwest corner of Otay Mesa Road and Ocean View Hills Parkway, while another approximately 10,000 square-foot combined fire and police rescue facility is planned approximately 0.5 mile east of the Project site at the intersection of Siempre Viva Road and Britannia Boulevard. (City of San Diego, 2014b, p. 5.13-2) As noted in the OMCPU Final PEIR, the Project would be subject to payment of Public Facilities Financing Plan (PFFP) fees, portions of which will be used by the City to construct the fire station as the need arises. Although the Project would increase the demand for fire protection services, the construction and operation of new fire protection facilities would be subject to separate environmental review that will be conducted by the City of San Diego once precise development plans for the new fire station have been prepared. As such plans are not currently available, it would be speculative to determine impacts associated with development of the new fire station at this time (CEQA Guidelines § 15145). Accordingly, Project impacts due to the need for new or expanded fire protection facilities would be less than significant and would be reduced compared to what was evaluated and disclosed by the OMCPU Final PEIR. (City of San Diego, 2014b, p. 5.13-21)

Police Protection

Buildout of the Project would increase demand for police protection and would contribute to the need for new or altered facilities. The city-wide goal for staffing ratio for police officers to population is 1.45 officers per 1,000 residents. Implementation of the Project would result in a future population of approximately 456 residents, which would generate a demand for approximately 0.7 new police officers (456 residents/1,000 persons x 1.45 peace officers = 0.7 police officers). However, and as noted in Addendum No. 408329, buildout of the CVSP, including the Project, would result in fewer residents than was assumed for the site as part of the OMCPU Final PEIR; thus, the Project would result in decreased demand for police protection services as compared to what was evaluated and disclosed as part of the OMCPU Final PEIR. (City of San Diego, 2014b, p. 5.13-22)

According to the OMCPU Final PEIR, the construction of a 10,000 square foot combined fire and police rescue facility located approximately 0.5 miles east of the Project site is planned to meet acceptable service levels in the Project area. As noted in the OMCPU Final PEIR, the Project would be subject to payment of PFFP fees, portions of which would be used by the City to construct the

combined police and fire rescue facility as the need arises. Although the Project would increase the demand for police protection services, the construction and operation of new public facilities would be subject to separate environmental review and payment of applicable fees that will be conducted by the City of San Diego once precise development plans for the new combined fire and police rescue facility have been prepared. As such plans are not currently available, it would be speculative to determine impacts associated with development of the new combined fire and police rescue facility at this time (CEQA Guidelines § 15145). Accordingly, Project impacts associated with the need for new or expanded police protection facilities would be less than significant and would be reduced compared to what was evaluated and disclosed by the OMCPU Final PEIR. (City of San Diego, 2014b, p. 5.13-22)

Schools

Buildout of the Project would result in additional demands on school services and would contribute to the need for new facilities. As indicated in Table 18, *Projected Project Student Population*, and based on the student generation rates shown in OMCPU Final PEIR Table 5.13-6 for the San Ysidro and Sweetwater School Districts, the Project is projected to generate approximately 72 K-8 students and 16 high school students per year.

Table 18 Projected Project Student Population

School Level	Student Generation Rate (Multi-Family)	Number of Units	Number of Students
K-8	0.5424	132	72
9-12	0.1171	132	16
	Totals:	**132**	**88**

(City of San Diego, 2014b, Table 5.13-6)

Thus, the Project would contribute to the need for new or expanded school facilities. However, and as noted in Addendum No. 408329, buildout of the CVSP, including the Project, would result in fewer residents than was assumed for the site as part of the OMCPU Final PEIR; thus, the Project would result in decreased demand for school services and facilities as compared to what was evaluated and disclosed as part of the OMCPU Final PEIR. (City of San Diego, 2014b, pp. 5.13-22 through 5.13-24)

The Project Applicant would be required to contribute fees in accordance with Senate Bill 50 (SB 50), which would be used by the local school districts to fund the construction or expansion of needed school facilities. Pursuant to the Leroy F. Greene School Facilities Act of 1998 (SB 50), payment of school impact fees constitutes complete mitigation under CEQA for impacts to school services and facilities.

Therefore, impacts associated with school facilities would be less than significant and would be reduced compared to what was evaluated and disclosed by the OMCPU Final PEIR. (City of San Diego, 2014b, pp. 5.13-22 through 5.13-24).

Parks

Buildout of the Project would result in the demand for new park facilities due to the increased population in the Project area. The OMCPU requires 2.8 acres of parkland per 1,000 residents. Because the Project would generate approximately 456 residents, the Project would generate a demand for approximately 1.28 acres of parkland (456 residents x 2.8 acres / 1,000 residents = 1.28 acres of parkland). However, and as noted in Addendum No. 408329, buildout of the CVSP, including the Project, would result in fewer residents than was assumed for the site as part of the OMCPU Final PEIR; thus, the Project would result in decreased demand for park and recreation facilities as compared to what was evaluated and disclosed as part of the OMCPU Final PEIR. Additionally, and consistent with the OMCPU and CVSP, the Project's parkland demand is intended to be accommodated by the parks planned within the CVSP area and Grand Park, which is planned by the OMCPU off-site at the southeastern corner of Cactus Road and Airway Road. The Project would be required to pay an in-lieu parkland fee in order to ensure that recreational opportunities are funded in the Project area. Thus, adequate park facilities have been planned in the local area to serve future residents of the Project, and no additional parkland would be needed beyond what has already been planned. Development of park facilities on the Project site and at the Grand Park were evaluated as part of the OMCPU Final PEIR and/or Addendum No. 408329. Development of these facilities would be subject to the Mitigation Frameworks identified by the OMCPU Final PEIR, which were identified to reduce to the maximum feasible extent impacts associated with parkland development both within the CVSP area and in the Grand Park. Furthermore, development of the Grand Park would be subject to a separate CEQA review process once precise plans for development of this facility are known. There are no components of the Project that would result in increased impacts due to the construction or expansion of recreational facilities beyond what was already evaluated and disclosed by the OMCPU Final PEIR, Addendum No. 408329, and throughout this document. Therefore, impacts associated with the construction of new or expanded park and recreation facilities would be less than significant.

Other Public Facilities

As noted in Addendum No. 408329, buildout of the CVSP, including the Project, would result in fewer residents than was assumed for the site as part of the OMCPU Final PEIR; thus, the Project would result in decreased demand for library facilities as compared to what was evaluated and disclosed as part of the OMCPU Final PEIR. As noted in the OMCPU Final PEIR, the existing Otay Mesa-Nestor Library serves the needs for both the Otay Mesa-Nestor and the Otay Mesa communities. In addition, the San Ysidro Library, located outside the OMCPU area, also is available for the residents of the Otay Mesa community. The OMCPU states that as the community further develops, a library facility would be provided within the OMCPU area. Although the specific location for this facility has not yet been determined, the OMCPU identifies a "Future Library Placeholder" located approximately 2.5 miles northwest of the Project site (City of San Diego, 2014a, PF-8 and Figure 6-1). As the precise location for this facility has not yet been identified, it would not be possible to evaluate impacts that may be associated with construction of this new facility (CEQA Guidelines § 15145). The proposed library facility has been planned to meet the needs of the projected OMCPU residents, including residents within the CVSP, and would be funded as part of the PFFP. The Project Applicant would be required to contribute PFFP fees, portions of which will be used by the City to construct the library facility as the need arises. Therefore, Project impacts associated with the

construction or expansion of library facilities would be less than significant and would be reduced compared to what was evaluated and disclosed by the OMCPU Final PEIR.

Summary

As demonstrated above, and consistent with the findings of the OMCPU Final PEIR, implementation of the Project would result in a less-than-significant impacts associated with the construction of new or expanded public facilities. Additionally, because the Project proposes fewer dwelling units than was assumed for the Project site by the OMCPU Final PEIR, the Project would result in decreased impacts associated with the provision of public services and facilities.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the PEIR occur.

UTILITIES AND SERVICE SYSTEMS

OMCPU Final PEIR

The OMCPU Final PEIR found that water, wastewater, reclaimed water, storm water infrastructure, and communication systems associated with the buildout of the OMCPU would not result in significant impacts to the environment. In regards to solid waste, the OMCPU Final PEIR found that implementation of the OMCPU would result in potentially significant impacts because the OMCPU Final PEIR could not guarantee at the program-level that all future projects would attain the 75 percent state-mandated diversion rate. The OMCPU Final PEIR identified Mitigation Framework UTIL-1 to reduce potential impacts, which requires that future development projects that generate 60 tons or more of solid waste prepare a Waste Management Plan (WMP). The OMPCU EIR found that even with implementation of mitigation framework UTIL-1 and compliance with the Storage, Recycling, and C&D ordinances, impacts related to solid waste to meet the diversion requirement cannot be assured at the program-level. Therefore, the OMCPU Final PEIR concluded that further evaluation would be required at the project level to identify additional mitigation measures to reduce significant impacts. As such, the OMCPU Final PEIR disclosed that impacts associated with solid waste were significant and unavoidable and a statement of overriding considerations was adopted.

Project

Water

Under existing conditions, the Project site is located within the Otay Water District (OWD) service area. The OWD's water system model was updated in 2010 and 2013 as part of the Water Resources Master Plan (WRMP) Update, which included potable water demands anticipated with implementation of the OMPCU. In 2016, OWD published the *2015 Water Facilities Master Plan Update*, which built on the 2010 and 2013 updates to the 2008 Water Resource Master Plan Update. As discussed in the OMCPU Final PEIR, the 2010 WRMP did not identify storage or pumping deficiencies under buildout of the OMPCU; thus, the 2010 WRMP did not identify any infrastructure improvements associated with implementation of the OMCPU (City of San Diego, 2014b, p. 5.14-18).

Additionally, the *2015 Water Facilities Master Plan Update* indicated that the OMPCU is anticipated to develop most of the planned water infrastructure, specifically water distribution facilities within local streets and major circulation roadways. Due to the relatively small size of the Project, the implementation of the Project is not anticipated to result in a substantial increase in potable water demand. Water service to the Project site would be provided via existing water lines located in Cactus Road. The Project would construct an on-site water system that would connect to the existing water lines within Cactus Road. The Project site would be constructed with up to 132 multi-family dwelling units, a use that would be consistent with the assumptions for the Project site in Addendum No. 408329 and the assumptions for the Project site in the OMCPU Final PEIR. The OMCPU Final PEIR determined that implementation of the OMCPU (including the Project) would not exceed the capacity of the existing mains within Airway and Cactus Road. Accordingly, and consistent with the finding of the OMCPU Final PEIR, impacts associated with water system improvements would be less than significant. Therefore, implementation of the Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU Final PEIR.

Wastewater

The City of San Diego would provide sanitary sewer service for the Project site via development of a new on-site sewer collection system and connections to the Otay Mesa Trunk Sewer system. As discussed in the OMCPU Final PEIR, The Project proposes construction of sewer lines on-site that would connect to existing and proposed off-site facilities. Sewer generation for the Project was previously estimated as part of the Lumina I project and was included in the hydraulic and sewers system sizing for the Lumina I project. It should be noted that the Project's sewer infrastructure would be constructed as part of the Lumina I project. The Project would require a sewer lateral connection to the proposed sewer system. The installation of sewer lines on-site as proposed by the Project would result in physical impacts to the surface and subsurface of infrastructure alignments. These impacts are part of the Project's construction phase and are evaluated throughout this document accordingly. The construction of wastewater lines as necessary to serve the Project would not result in any significant physical effects on the environment that are not already identified and disclosed as part of this document or by the OMCPU Final PEIR. As such, impacts would be less than significant.

According to the Amendment No. 1 Sewer Study prepared for the Project (*Appendix H*), buildout of the Project is calculated to demand an average of 0.04 mgd, which would be within the assumptions for the Project site in the Addendum and below the assumptions for the Project site in the OMCPU Final PEIR. The OMCPU Final PEIR determined that additional wastewater system improvements beyond what have been identified in master planning documents would be required in the OMCPU area. However, the need for these improvements would not result in any new significant impacts, because the 2004 OMTS Sewer Master Plan and 2009 Refinement Report previously identified these improvements as required in future phases to accommodate buildout wastewater generation in the area. (CH2M, 2020)

Based on the foregoing analysis and consistent with the findings of the OMCPU Final PEIR, the Project would not require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities not previously analyzed, the construction of which would cause significant environmental effects, and impacts would be less than significant.

Therefore, implementation of the Project would not result in any new impacts or increase the severity of a previously-identified significant impact as analyzed in the OMCPU Final PEIR.

Reclaimed Water

Under existing conditions, the Project site is located within the OWD service area and would receive recycled water from OWD water facilities (City of San Diego, 2014b, p. 5.14-18). The OWD currently operates a 1.2-mgd reclamation plant and has an agreement to purchase up to 6 mgd of recycled water from the City. The OWD's 2008 WRMP included recycled water projections under the adopted community plan, and the 2010 WRMP incorporated projections under the OMCPU. The OMCPU area is within the OWD's 860 pressure zone, which will ultimately be supplied from a new 860-1 reservoir through planned 30-inch diameter transmission mains (City of San Diego, 2014b, p. 5.14-18). As discussed in the OMCPU Final PEIR, the 2010 WRMP did not identify storage or pumping deficiencies under buildout of the OMPCU; thus, the 2010 WRMP did not identify any infrastructure improvements associated with implementation of the OMCPU (City of San Diego, 2014b, p. 5.14-18). Improvements to the recycled water systems have been previously identified, and would be required whether or not the OMCPU, including the Project, is implemented. There are no changes proposed as part of the Project that would result in new or more severe impacts due to reclaimed water beyond what was evaluated in the OMCPU Final PEIR. Accordingly, and consistent with the finding of the OMCPU Final PEIR, impacts associated with recycled water system improvements would be less than significant. Based on the foregoing analysis, implementation of the Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU Final PEIR.

Solid Waste

Future development on-site would be required to comply with OMCPU Final PEIR Mitigation Framework UTIL-1, which would require implementation of a site-specific WMP. Impacts associated with solid waste would occur if the Project would require a new solid waste facility or if the Project would not meet the 75 percent solid waste diversion rate as mandated by AB 341.

Solid waste generated by the Project site during construction and operation would be disposed of either the Miramar Landfill, Sycamore Sanitary Landfill, or the Otay Landfill. The Miramar Landfill is located approximately 21.6 miles northwest of the Project site, with a daily permitted capacity of 8,000 tons per day (tpd). The Sycamore Sanitary Landfill is located 20.3 miles northwest of the Project site, with a daily permitted capacity of 5,000 tpd. The Otay Landfill is located approximately 3.0 miles northwest of the Project site, with a daily permitted capacity of 6,700 tpd. (CalRecycle, 2020)

Implementation of the Project would result in the demolition of the existing on-site single-family residence, totaling 4,500 s.f. and would remove approximately 183,00 s.f. of landscape debris. The demolition of residential structures is anticipated to generate 3 pounds (lbs) per s.f.; therefore, the demolition of the existing structure is calculated to generate 6.75 tons of solid waste. Additionally, landscaping debris is anticipated to generate 3 lbs per s.f.; therefore, the demolition of the site's existing landscaping is calculated to generate 274.5 tons. In accordance with Section 66.0606(d)(3) of the City's Municipal Code, the Project would be required to divert a minimum of 65% of

demolition waste from the landfill. Diverted waste would be reused or diverted by salvaging or source separating.

It should be noted that that a "worst-case" scenario analysis was utilized to estimate the Project's construction-related solid waste generation. The maximum floor area ratio (FAR) permitted on the Project site as required by the CVSP is 1.5 FAR. The Project would result in a maximum total of 33,615 s.f. (4.98 acres x 4,500 s.f. x 1.5 FAR) of building area on-site and would generate approximately 50.42 tons of building construction waste. In accordance with Section 66.0606(d)(3) of the City's Municipal Code, the Project would be required to divert a minimum of 65% of demolition waste from the landfill. Diverted waste would be reused or diverted by salvaging or source separating.

According to the solid waste generation rates specified by the OMCPU Final PEIR, residential land uses generate approximately 7.8 pounds of solid waste per unit per day. The Project would allow for the future development of up to 132 multi-family dwelling units. Accordingly, the Project would generate a total of approximately 188 tons of waste per year or 0.5 tpd [(132 units x 7.8 pounds per day x 365 days per year x .005 tons = 188 tons/year). The Project's daily solid waste generation would represent less than 1 percent of the daily capacity at the Miramar Landfill, the Sycamore Sanitary Landfill, the Otay Landfill. Furthermore, the Project would provide recycling services on-site and would be required to participate in the City's recycling programs to reduce the volume of solid waste being delivered to the landfills.

Future development on-site would be required to comply with OMCPU Final PEIR Mitigation Framework UTIL-1. Additionally, the Project and future development would be subject to mandatory compliance with the Storage, Recycling, and C&D ordinances; thus, the Project would meet the waste diversion requirement and would not exceed the daily capacity of the Miramar Landfill, Sycamore Sanitary Landfill, or Otay Landfill. Accordingly, the Project would be served by landfills with adequate capacity, and impacts would be less than significant. Because the OMCPU Final PEIR determined impacts would be significant and unavoidable, Project impacts would be reduced in comparison to what was evaluated and disclosed by the OMCPU Final PEIR. Therefore, implementation of the Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU Final PEIR.

Storm Water Drainage Facilities

Under existing conditions, there are minimal drainage improvements within the Project site boundary. The majority of the Project drains to the south and into the Lumina I project site. Overall, the Project site drains into to a steep finger canyon (Wruck Creek) located west of the existing Cactus Road and Siempre Viva Road intersection. Two of the finger canyons drain to sump areas that are collected and drained to the west and discharged downstream within the canyon via an existing RCP storm drain per City Drawing 23871-21-D.

Development on the Project site as called for under the OMCPU and the Project would increase impervious surfaces, resulting in the potential for greater surface runoff and increased demands on existing storm water systems within the OMCPU area as compared to the existing condition. With implementation of the Project, runoff from the Project site would be collected via inlets, pipes, brow ditches, roof drains, and water quality features/detention basins. Project flows would be conveyed

via on-site storm drain infrastructure to the proposed drainage improvements for the Lumina I project, which will be detained in the proposed Lumina South Basin (PDC, 2019a).

There would be no environmental impacts associated with the Project's proposed drainage infrastructure that have not already been addressed. Additionally, the Project is required to comply with OMCPU Policies and CVSP Policies (see CVSP Section 2.6.2) to ensure that impacts due to installation of storm water infrastructure would be reduced to below a level of significance. Furthermore, because the Project meets City of San Diego requirements for on-site drainage facilities, the Project would not result in or require expansion of off-site drainage facilities. Accordingly, and consistent with the findings of the OMCPU Final PEIR, impacts associated with storm water facilities would be less than significant.

Communication Systems

The Project site would be provided cable services by Cox Communications and telephone services by AT&T, which are private companies that would have the capacity to serve the Project area. Additionally, in accordance with Section 144.0240 of the City's Municipal Code, the Project would be required to place privately owned utility systems and service facilities underground. In addition, the installation of new communication systems for future development projects would be within existing or planned roadways; therefore, construction impacts would not be significant. Accordingly, and consistent with the finding of the OMCPU Final PEIR, impacts associated with communication system improvements would be less than significant.

Summary

Consistent with the findings of the OMCPU Final PEIR, impacts associated with water system improvements, wastewater system improvements, wastewater treatment improvements, recycled water system improvements, storm water drainage facility improvements, and communication system improvements would be less than significant. Furthermore, consistent with the findings of the OMCPU Final PEIR, impacts associated with solid waste would be significant and unavoidable; however, it should be noted that Project impacts would be reduced in comparison to what was evaluated and disclosed by the OMCPU Final PEIR

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the PEIR occur.

WATER SUPPLY

OMCPU Final PEIR

The OMCPU Final PEIR found that based on the Water Supply Assessments (WSA) of the City's water suppliers providing service to the OMCPU area, including the Public Utilities Department and OWD, there would be sufficient water supply to serve existing demands and projected demands of the OMCPU. As such, the OMPCU EIR concluded that impacts related to water supply would be less than significant. (City of San Diego, 2014b, pp. 5.15-10 through 5.15-15)

The OMCPU Final PEIR found that buildout of the OMCPU would result in the placement of new landscaping throughout the OMCPU area that would require watering for irrigation purposes. However, the OMCPU Final PEIR found that all future development would be required to conform with existing regulations, as well as the General Plan and OMCPU policies, which would ensure the use of predominantly drought-resistant landscaping and water conservation for landscape maintenance. As such, the OMCPU Final PEIR found that impacts related to the use of non-drought resistant landscaping and excessive water usage for irrigation would be less than significant without mitigation. (City of San Diego, 2014b, pp. 5.15-15 through 5.15-16)

Project

The Project site is located within the OWD service area. According to the OWD WSA prepared for the OMCPU Final PEIR (City of San Diego, 2014b), estimated water supply would meet the projected water demands of the OWD service areas during a normal, single dry year, and multiple dry years over a 20-year period.

The Project's proposed demand would be within the demand estimated in Addendum No. 408329 and the demand assumed for the CVSP area by the OMCPU Final PEIR's WSA (City of San Diego, 2014b). The only notable change in water supply from the OMCPU WSA is that the OWD has implemented a moratorium on the use of recycled water in the Otay Mesa area due to the high capital cost to extend recycled water service to the area in an OWD Board action dated July 2, 2014. As a result, the OWD would not require the construction of any recycled water facilities as part of the Project, and therefore all future irrigation would be served from the potable water system. Therefore, based on the findings from the OWD 2015 Urban Water Management Plan (UWMP), the Project would result in minor unanticipated demands (as noted above due to the elimination of recycled water irrigation) that could be supplied by the Water Authority's Accelerated Forecasted Growth supply (OWD, 2016).

Based the foregoing analysis, and on the information contained in the WSAs prepared for the OMCPU Final PEIR and CVSP, there is adequate water to serve the Project based on the Project's proposed land uses, which are consistent with the CVSP and would produce less water demand than was assumed for the site by the OMCPU WSA. As such, it can be concluded that there is sufficient water supply to serve the Project. Accordingly, and consistent with the findings of the OMCPU Final PEIR, impacts associated with the ability of water-serving agencies to provide water would be less than significant.

As noted in the OMCPU Final PEIR, the OMCPU would result in the placement of new landscaping that would require watering for irrigation purposes; however, impacts were previously concluded to be less than significant due to future developments requirement to adhere to existing regulations, General Plan, and OMCPU policies, which would ensure the use of predominantly drought-resistant landscaping and water conservation for landscape maintenance. In addition, the Project is located within the CVSP, which includes policies and design standards related to landscaping and requires adherence to the CVSP's Plant Palette. The CVSP Plant Palette predominantly includes plant species that are drought tolerant and that were selected to reduce future irrigation demands associated with buildout of the CVSP (T&B Planning, 2017). The Project would be required to adhere to existing regulations, General Plan, OMCPU, CVSP policies related to landscaping, and the CVSP Plant Palette; as such, the Project would not allow for the use of predominantly non-drought resistant landscaping

or excessive water usage for irrigation and other purposes, and impacts would be less than significant.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the PEIR occur.

POPULATION AND HOUSING

OMCPU Final PEIR

The OMCPU Final PEIR found that buildout of the OMPCU would result in substantial population growth. However, the OMCPU Final PEIR found that the OMCPU would implement policies contained in SANDAG's RCP (updated and renamed to: San Diego Forward: The Regional Plan, approved October, 2015) and the City of San Diego's General Plan by providing a mix of housing types near public transportation, increase the regional and local supply of housing needed in accordance with SANDAG's regional growth forecast, and focus housing supply within compact villages that would be linked together by public transportation. As such, the OMCPU Final PEIR found that impacts associated with population growth would be less than significant without mitigation. (City of San Diego, 2014b, pp. 5.16-5 through 5.16-8)

The OMCPU Final PEIR found that approximately 77 percent of the residential dwelling units associated with the buildout of the OMCPU would consist of multi-family units and implementation of the OMCPU Policies 2.2-5 through 2.2-8 would provide affordable housing within the OMCPU area. As such, the OMCPU Final PEIR concluded that the OMPCU would be consistent with federal and state affordable housing, and impacts associated with affordable housing would be less than significant without mitigation.

Project

As noted in the OMPCU EIR, buildout of the OMCPU, including the Project site, would result in both direct and indirect substantial population growth; however, impacts due to direct and indirect substantial population growth were previously concluded to be less than significant in the OMCPU Final PEIR. The OMCPU Final PEIR found that OMCPU policies implement the SANDAG's RCP (updated and renamed as "San Diego Forward: The Regional Plan," which was approved October, 2015) and the City's General Plan and Housing Element by focusing population growth and housing supply within compact villages. The Project site is located within one of the OMCPU's planned villages. The Project would allow for the future development of up to 132 dwelling units, which is consistent with the CVSP and represents a slight reduction in dwelling units as compared to what was assumed for the site by the OMCPU Final PEIR. As such, the Project would result in no new significant effects (on-site, off-site, or cumulative) and there is no new information indicating a more severe adverse impact beyond what was disclosed by the OMCPU Final PEIR.

Consistent with the finding of the OMCPU Final PEIR, the Project accommodates future development of 132 multi-family dwelling units with densities ranging from 10-29 du/ac, which would assist the City in providing a range of housing choices affordable to lower-income residents. The Project would be fully consistent with the General Plan, OMCPU, and CVSP, and no land use changes are

proposed as part of the Project. Furthermore, future development on site would be subject to the City's Inclusionary Affordable Housing Regulations (Municipal Code Chapter 14, Article 2, Division 13), which requires either the provision of affordable dwelling units on site or the payment of in-lieu fees. There are no components of the Project that would involve land use modifications or a conflict with the City's Inclusionary Affordable Housing Ordinance, and impacts would be less than significant.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the PEIR occur.

AGRICULTURAL AND MINERAL RESOURCES

OMCPU Final PEIR

The OMCPU Final PEIR concluded that buildout of the OMCPU would convert 180 acres of Farmland of Statewide Importance and 28 acres of Unique Farmland to non-agricultural use, both of which occur within the Central Village area. However, the OMCPU Final PEIR found that these areas are fragmented and are surrounded by urban land uses and MHPA lands. Rising land values, water costs, increasing taxes, habitat management planning, and other land use conflicts were found to have contributed to a significant reduction in future agricultural viability within the OMCPU area. Furthermore, agricultural land in the OMCPU area is intended as an interim, rather than permanent use. The OMCPU allows agriculture as an interim use pending development and the City rezoned the Central Village to an agricultural "holding" zone (AR-1-1) concurrently with adoption of the OMCPU to accommodate continued agricultural operations until such time that a Specific Plan is implemented. Therefore, impacts associated with the conversion of agricultural land to nonagricultural uses were found by the OMCPU Final PEIR to be less than significant. (City of San Diego, 2014b, pp. 4.17-11 and 4.17-12)

The OMCPU Final PEIR concluded that buildout of the OMCPU would convert 180 acres of Farmland of Statewide Importance and 28 acres of Unique Farmland to non-agricultural use, both of which occur within the Central Village area. However, the OMCPU Final PEIR found that these areas are fragmented and are surrounded by urban land uses and MHPA lands. Rising land values, water costs, increasing taxes, habitat management planning, and other land use conflicts were found to have contributed to a significant reduction in future agricultural viability within the OMCPU area. Furthermore, agricultural land in the OMCPU area is intended as an interim, rather than permanent use. The OMCPU allows agriculture as an interim use pending development and the City rezoned the Central Village to an agricultural "holding" zone (AR-1-1) concurrently with adoption of the OMCPU to accommodate continued agricultural operations until such time that a Specific Plan is implemented. Therefore, impacts associated with the conversion of agricultural land to nonagricultural uses were found by the OMCPU Final PEIR to be less than significant. (City of San Diego, 2014b, pp. 4.17-11 and 4.17-12)

The OMCPU Final PEIR found that portions of the OMCPU area are located within Mineral Resource Zone (MRZ)-2 and MRZ-3. MRZ-3 zones are not considered sensitive because they comprise areas that may or may not have mineral resources. However, MRZ-2 lands represent areas containing regionally significant mineral deposits. The OMCPU Final PEIR found that the majority of acreage designated MRZ-2, which occurs in the northernmost portion of the OMCPU area, contains existing

residential uses that would be incompatible with the establishment of any new mineral resource operations. In addition, the OMCPU Final PEIR found that the OMCPU area does not include any existing or proposed mining operations, and development associated with buildout of the OMCPU would not result in indirect impacts to any existing extraction operations in the vicinity of the OMCPU. As such, the OMCPU Final PEIR concluded that the ability to extract mineral resources would not be impacted with implementation of the OMCPU. The General Plan and OMCPU also do not identify any portion of the OMCPU as a locally important mineral resources recovery site, and no impact due to the loss of such locally-important sites would occur. (City of San Diego, 2014b, pp. 5.17-13 through 5.17-15)

Project

According to mapping available from the California Department of Conservation's (CDC) Farmland Mapping and Monitoring Program (FMMP), the Project site is identified as containing Unique Farmland. Buildout of the Project would convert on-site lands, including areas identified as Unique Farmland to non-agricultural use. (CDC, 2018) However, as noted in the OMCPU Final PEIR, Farmland within the OMCPU area is intended as an interim use. Conversion to urban development is expected upon buildout of the area in accordance with the OMCPU. Additionally, the Project is zoned for residential uses and is not zoned for agricultural uses. As noted by the OMCPU Final PEIR, rising land values, water costs, increasing taxes, habitat management planning, and other land use conflicts are anticipated to reduce the viability of agricultural activities on site over time. The Project's impacts to Farmland are consistent with the impacts disclosed in the OMCPU Final PEIR, and there are no components of the Project that would result in new or more severe impacts to Farmland either on or off site. Consistent with the findings of the OMCPU Final PEIR, impacts due to the Project's anticipated conversion of Farmland to non-agricultural uses would less than significant.

As noted above, buildout of the Project would convert on-site lands, including areas identified as Unique Farmland to non-agricultural uses. (CDC, 2018) However, as noted in the OMCPU Final PEIR, Farmland within the OMCPU area is intended as an interim use. Conversion to urban development is expected upon buildout of the area in accordance with the OMCPU. Additionally, the Project is zoned for residential uses, and is not zoned for agricultural uses. Consistent with the findings of the OMCPU Final PEIR, rising land values, water costs, increasing taxes, habitat management planning, and other land use conflicts are anticipated to reduce the viability of agricultural activities on site over time. The Project's impacts to Farmland are consistent with the impacts disclosed in the OMCPU Final PEIR, and there are no components of the Project that would result in new or more severe impacts due to the conversion of farmland to non-agricultural use. Consistent with the findings of the OMCPU Final PEIR, the Project's anticipated conversion of Farmland to non-agricultural uses represent less-than-significant impacts of the Project.

The General Plan and OMCPU do not identify the Project site as a locally important mineral resources recovery site, and no impact due to the loss of such locally-important sites would occur as a result of Project implementation. According to OMCPU Final PEIR Figure 5.17-3, the Project site is located within the MRZ-3 mineral resources zone, which "are areas containing mineral deposits, the significance of which cannot be evaluated from available data" (City of San Diego, 2014b, p. 5.17-10 and Figure 5.17-3). Accordingly, and consistent with the finding of the OMCPU Final PEIR, future development on-site would result in a less-than-significant impact associated with the loss of availability of a known mineral resource as identified in the *Open File Report 96-04, Update of Mineral*

Land Classification: Aggregate Materials in the Western San Diego County Production – Consumption Region, 1996, Department of Conservation, California Department of Geological Survey.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the PEIR occur.

GREENHOUSE GAS EMISSIONS

OMCPU Final PEIR

The OMCPU Final PEIR found that buildout of the OMCPU would reduce greenhouse gas (GHG) emissions by between 9.1 and 11.4 percent compared to Business as Usual (BAU), which does not meet the City's goal of a minimum 28.3 percent reduction in emission levels; therefore, the OMCPU Final PEIR found that impacts associated with GHG emissions would be significant. The OMCPU Final PEIR identified Mitigation Framework GHG-2 to reduce impacts, which requires future development projects to demonstrate avoidance of significant impacts related to long-term operational emissions as identified in Mitigation Framework GHG-1, and to include project-level GHG reduction design features that demonstrate a reduction in GHG emissions to the extent practicable. The OMCPU Final PEIR concluded that even with adherence to Mitigation Framework GHG-2 and compliance with applicable General Plan and OMPCU policies, impacts associated with the contribution of GHG emissions to cumulative statewide emissions would be significant and unavoidable. A statement of overriding considerations was adopted for this impact. (City of San Diego, 2014b, pp. 5.18-16 through 5.18-26)

Although the OMCPU contains policies that are consistent with the strategies of local and state plans to reduce GHG emissions, the OMCPU Final PEIR found that future development projects may not meet the City's reduction goals associated with achieving the reductions required by AB 32; therefore, the OMCPU Final PEIR found that the OMCPU would have potential to conflict with applicable plans and impacts would be potentially significant at the program-level. The OMCPU Final PEIR identified Mitigation Framework GHG-1 to reduce potential impacts, which requires future development projects to demonstrate avoidance of significant impacts related to long-term GHG emissions by including GHG-reducing features based on a project-specific analysis. The OMCPU Final PEIR concluded that even with adherence to Mitigation Framework GHG-1 and compliance with applicable General Plan and OMPCU policies, impacts related to GHG emissions would be significant and unavoidable. A statement of overriding considerations was adopted for this impact. (City of San Diego, 2014b, pp. 5.18-12 through 5.8-16)

Project

Following certification of the OMCPU Final PEIR, the City adopted a Climate Action Plan (CAP) in December 2015 that outlines the actions the City will undertake to achieve its proportional share of State GHG emission reductions. The City has identified the following CAP strategies to reduce GHG: energy- and water-efficient buildings; clean and renewable energy; bicycling, walking, transit, and land use; zero waste (gas and waste management); and climate resiliency. In order to ensure that future developments comply with the CAP, the City adopted a CAP Consistency Checklist, adopted July 12, 2016, and revised June 2017, which is the primary document utilized by the City to ensure a

project-by-project consistency with the underlying assumptions in the CAP to ensure that the specified emission reduction targets identified in the CAP are achieved.

The OMCPU Final PEIR Identified various policies and recommendations aimed to reduce GHG emissions which support the City's reduction goals outlined in the CAP, which include reducing GHG emissions by 15 percent from the year 2010 baseline by year 2020, and reducing GHG emissions by 50 percent from the year 2010 baseline by year 2035. Therefore, in keeping with the policies in the OMCPs, the project would be required to comply with the CAP Consistency Checklist. By implementing the measures outlined in the CAP Consistency Checklist, the project would meet the goals and strategies of the CAP.

CAP Consistency Checklist

As previously noted above, in the time following the certification of the OMCPU Final PEIR (2014), the City of San Diego adopted a CAP (December 2015) and an amendment to the CAP to add a Consistency Checklist. For purposes of analysis herein, the significance threshold related to "conflicting with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of GHGs" is based on the City's approved CAP, which is the methodology now used by the City in order to provide a consistent, localized, and comprehensive approach for the assessment of GHG impacts. Thus, and consistent with Addendum No. 408329, the threshold utilized in the OMCPU Final PEIR has been replaced with a threshold that specifically references the City's CAP as the applicable plan for reducing GHG emissions in the City of San Diego. Projects that are consistent to conclude that the Project would have less than significant cumulatively considerable GHG emissions impacts under CEQA.

Determining significance under this threshold for the Project, a discretionary Tentative Map that does not propose specific development, entailed the preparation of "Step 1" of a Climate Action Plan Consistency Checklist. Pursuant to the requirements of the CAP Consistency Checklist, "Step 2" only applies to development projects that involve permits that would require a certificate of occupancy from the Building Official or projects comprised of one- and two-family dwellings or townhouses as defined in the California Residential Code and their accessory structures. Step 3" of the CAP Consistency Checklist only applies if development projects include a land use plan and/or zoning designation change within a Transit Priority Area (TPA) that would result in an increase in density. The Project consists of a Tentative Map that does not entail specific development and does not involve a permit that would require a certificate of occupancy or a change in the land use and/or zoning designation; thus, "Step 2" and "Step 3" consistency was not required. The CAP Consistency Checklist for the Project is included as *Appendix A*. It should be noted that future development on-site would be required to comply with OMCPU Final PEIR Mitigation Framework GHG-1, which requires preparation of a CAP Consistency Checklist. Additionally, future development on-site would be required to comply with OMCPU Final PEIR Mitigation Framework GHG-2.

The Project's CAP Consistency Checklist analysis determined that the Project is compliant with the City's CAP. Because the City's CAP was prepared in compliance with CEQA Section 15183.5 and is intended to achieve the City of San Diego's share of Statewide GHG reduction targets, the Project's demonstrated compliance with the CAP indicates that a less than significant GHG impact would occur related to compliance with planning policies and regulations. No new impact would occur in

comparison to the GHG analysis presented in the OMCPU Final PEIR, and the Project would reduce the OMCPU Final PEIR's significant and unavoidable impact to less-than-significant levels.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the PEIR occur.

VI. ISSUES NOT ANALYZED IN THE PREVIOUS EIR

CEQA Guidelines, Section 15128, allows environmental issues for which there is no likelihood of a significant impact to not be discussed in detail or analyzed further in the EIR. The certified PEIR provided a similar level of analysis, even for those issue areas considered to result in impacts found not to be significant.

Revisions to the project components evaluated under the PEIR are proposed with the current project. Through the environmental analysis conducted, the City has determined that the current project, subject of and evaluated under this Addendum would not have the potential to cause significant impacts to those issue areas beyond those analyzed. While these issues were not analyzed in detail, as outlined in CEQA Section 15128, there is no new information available that would indicate that these issues would result in new significant impacts.

VII. SIGNIFICANT UNMITIGATED IMPACTS

The OMCPU Final PEIR indicated that significant impacts to the following issue areas would be substantially lessened or avoided if all the proposed mitigation measures recommended in the Final PEIR were implemented: land use; biological resources; historical resources; human health/public safety/hazardous materials; hydrology/water quality; geology/soils; and paleontological resources. The Final PEIR further concluded that significant impacts related to air quality, noise, utilities, and GHG emissions would not be fully mitigated to below a level of significance. With regard to cumulative impacts, implementation of the OMCPU Final PEIR would result in significant impacts related to air quality, noise, traffic/circulation (horizon year), utilities (solid waste), agriculture resources, and GHG emissions, which would remain significant and unmitigated. As there were significant unmitigated impacts associated with the original project approval, the decision maker was required to make specific and substantiated "CEQA Findings" which stated: (a) specific economic, social, or other considerations which make infeasible the mitigation measures or project alternatives identified in the OMCPU Final PEIR, and (b) the impacts have been found acceptable because of specific overriding considerations. Given that there are no new or more severe significant impacts that were not already addressed in the previous certified Final PEIR, new CEQA Findings and/or Statement of Overriding Considerations are not required.

The project would not result in any additional significant impacts nor would it result in an increase in the severity of impacts from that described in the previously certified Final PEIR.

VIII. MITIGATION, MONITORING AND REPORTING PROGRAM INCORPORATED INTO THE PROJECT

The project shall be required to comply with the applicable mitigation measures outlined within the Mitigation Monitoring and Reporting Program (MMRP) of the previously certified PEIR (No. 30330/304032/SCH No. 2004651076) and those identified with the project-specific subsequent technical studies. The following MMRP identifies measures that specifically apply to this project.

A. GENERAL REQUIREMENTS: PART I – Plan Check Phase (prior to permit issuance)

1. Prior to the issuance of a Notice To Proceed (NTP) for a subdivision, or any construction permits, such as Demolition, Grading or Building, or beginning any construction related activity on-site, the Development Services Department (DSD) Director's Environmental Designee (ED) shall review and approve all Construction Documents (CD), (plans, specification, details, etc.) to ensure the MMRP requirements are incorporated into the design.

2. In addition, the ED shall verify that the MMRP Conditions/Notes that apply ONLY to the construction phases of this project are included VERBATIM, under the heading,

3. **"ENVIRONMENTAL/MITIGATION REQUIREMENTS."**

3. These notes must be shown within the first three (3) sheets of the construction documents in the format specified for engineering construction document templates as shown on the City website: http://www.sandiego.gov/development-services/industry/standtemp.shtml

4. The **TITLE INDEX SHEET** must also show on which pages the "Environmental/Mitigation Requirements" notes are provided.

5. **SURETY AND COST RECOVERY –** The Development Services Director or City Manager may require appropriate surety instruments or bonds from private Permit Holders to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

B. GENERAL REQUIREMENTS: PART II – Post Plan Check (After permit issuance/Prior to start of construction)

1. **PRECONSTRUCTION MEETING IS REQUIRED TEN (10) WORKING DAYS PRIOR TO BEGINNING ANY WORK ON THIS PROJECT.** The PERMIT HOLDER/OWNER is responsible to arrange and perform this meeting by contacting the CITY RESIDENT ENGINEER (RE) of the Field Engineering Division and City staff from MITIGATION MONITORING COORDINATION (MMC). Attendees must also include the Permit holder's Representative(s), Job Site Superintendent and the following consultants:

   Qualified Biologist, Qualified Archaeologist, and Native American Monitor

   Note: Failure of all responsible Permit Holder's representatives and consultants to attend shall require an additional meeting with all parties present.

   CONTACT INFORMATION:
   a) The PRIMARY POINT OF CONTACT is the **RE** at the **Field Engineering Division, 858-627-3200.**
   b) For Clarification of ENVIRONMENTAL REQUIREMENTS, it is also required to call **RE and MMC at 858-627-3360.**

2. **MMRP COMPLIANCE:** This Project, Project Tracking System (PTS) No. 625830 and/or Environmental Document No. 625830, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the DSD's Environmental Designee (MMC) and the City Engineer (RE). The requirements may not be reduced or changed but may be annotated (i.e. to explain when and how compliance is being met and location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (i.e., specific locations, times of monitoring, methodology, etc.

   Note: Permit Holder's Representatives must alert RE and MMC if there are any discrepancies in the plans or notes, or any changes due to field conditions. All conflicts must be approved by RE and MMC BEFORE the work is performed.

2. **OTHER AGENCY REQUIREMENTS:** Evidence of compliance with all other agency requirements or permits shall be submitted to the RE and MMC for review and acceptance prior to the beginning of work or within one week of the Permit Holder obtaining documentation of those permits or requirements. Evidence shall include copies of permits, letters of resolution or other documentation issued by the responsible agency:
   Not Applicable

4. **MONITORING EXHIBITS**: All consultants are required to submit, to RE and MMC, a monitoring exhibit on a 11x17 reduction of the appropriate construction plan, such as site plan, grading, landscape, etc., marked to clearly show the specific areas including the **LIMIT OF WORK**, scope of that discipline's work, and notes indicating when in the construction schedule that work will be performed. When necessary for clarification, a detailed methodology of how the work will be performed shall be included.

   Note: Surety and Cost Recovery – When deemed necessary by the Development Services Director or City Manager, additional surety instruments or bonds from the private Permit Holder may be required to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

1. **OTHER SUBMITTALS AND INSPECTIONS:** The Permit Holder/Owner's representative shall submit all required documentation, verification letters, and requests for all associated inspections to the RE and MMC for approval per the following schedule:

C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

Programmatic Mitigation Associated with Future Development

AIR QUALITY/ODOR

Mitigation Framework AQ-1:

For projects that would exceed daily construction emissions thresholds established by the City of San Diego, best available control measures/technology shall be incorporated to reduce construction emissions to below daily emission standards established by the City of San Diego. Best available control measures/technology shall include:

a. Minimizing simultaneous operation of multiple pieces of construction equipment;

b. Use of more efficient or low pollutant emitting, equipment, e.g. Tier III or IV rated equipment;

c. Use of alternative fueled construction equipment;

d. Dust control measures for construction sites to minimize fugitive dust, e.g. watering, soil stabilizers, and speed limits; and

e. Minimizing idling time by construction vehicles.

Mitigation Framework AQ-2:

Development that would significantly impact air quality, either individually or cumulatively, shall receive entitlement only if it is conditioned with all reasonable mitigation to avoid, minimize, or offset the impact. As a part of this process, future projects shall be required to buffer sensitive receptors from air pollution sources through the use of landscaping, open space, and other separation techniques.

HUMAN HEALTH/PUBLIC SAFETY/HAZARDOUS MATERIALS

Mitigation Framework HAZ-2:

To prevent the development of structures that may pose a hazard to air navigation, the City shall inform project applicants for future development concerning the existence of the Part 77 imaginary surfaces and Terminal Instrument Procedures and FAA requirements. The City shall also inform project applicants when proposed projects meet the Part 77 criteria for notification to the FAA as identified in City of San Diego Development Services Department Information Bulletin 520. The City shall not approve ministerial projects that require FAA notification without a FAA determination of "No Hazard to Air Navigation" for the project. Also, the City shall not recommend approval for discretionary projects that require FAA notification without a FAA determination of "No Hazard to Air Navigation" for the project until the project can fulfill state and ALUC requirements.

HYDROLOGY AND WATER QUALITY

Mitigation Framework HYD/WQ-1:

Prior to approval of development projects implemented under the CPU, the applicant shall demonstrate to the satisfaction of the City Engineer, based on the project application, that future projects are sited and designed to minimize impacts on absorption rates, drainage patterns, and surface runoff rates and floodwaters in accordance with current City and RWQCB regulations identified below. Future design of projects shall incorporate feasible mitigation measures outlined below in accordance with the RWQCB, the City Storm Water Runoff and Drainage Regulations (Chapter 14, Article 2, Division 2 of the LDC), and the LDC, and shall be based on the recommendations of a detailed hydraulic analysis.

a. San Diego RWQCB

- Comply with all NPDES permit(s) requirements, including the development of a SWPPP if the disturbed soil area is one acre or more, or a Water Quality Control Plan if less than one acre, in accordance with the City's Storm Water Standards.

- If a future project includes in-water work, it shall require acquiring and adhering to a 404 Permit (from USACE) and a Streambed Alteration Agreement (from CDFW).

- Comply with the San Diego RWQCB water quality objectives and bacteria TMDL.

b. City of San Diego

To prevent flooding, future projects shall be designed to incorporate any applicable measures from the City of San Diego LDC. Flood control measures that shall be incorporated into future projects within a SFHA, or within a 100-year floodway, include but are not limited to the following:

- Prior to issuance of building permits or approval of any project within or in the vicinity of a floodway or SFHA, all proposed development within a SFHA is subject to the following requirements and all other applicable requirements and regulations of FEMA and those provided in Chapter 14, Article 3, Division 1 of the LDC.

- In all floodways, any encroachment, including fill, new construction, significant modifications, and other development, is prohibited unless certification by a registered professional engineer is provided demonstrating that encroachments shall not result in any increase in flood levels during the occurrence of the base flood discharge except as allowed under Code of Federal Regulations Title 44, Chapter 1, Part 60.3(c)

- If the engineering analysis shows that development will alter the floodway or floodplain boundaries of the Special Flood Hazard Area, the developer shall obtain a Conditional Letter of Map Revision from FEMA.

- Fill placed in the Special Flood Hazard Area for the purpose of creating a building pad shall be compacted to 95 percent of the maximum density obtainable with the Standard Proctor

Test Fill method issued by the American Society for Testing and Materials (ASTM) Granular fill slopes shall have adequate protection for a minimum flood water velocity of five feet per second.

- The applicant shall denote on the improvement plans "Subject to Inundation" all areas lower than the base elevation plus two feet.

- If the structures will be elevated on fill such that the lowest adjacent grade is at or above the base flood elevation, the applicant must obtain a Letter of Map Revision based on Fill (LOMR-F) prior to occupancy of the building. The developer or applicant shall provide all documentation, engineering calculations, and fees required by FEMA to process and approve the LOMR-F.

- In accordance with Chapter 14, Article 3, Division 1 of the LDC channelization or other substantial alteration of rivers or streams shall be limited to essential public service projects, flood control projects, or projects where the primary function is the improvement of fish and wildlife habitat. The channel shall be designed to ensure that the following occur:

  - Stream scour is minimized.
  - Erosion protection is provided.
  - Water flow velocities are maintained as specified by the City Engineer.
  - There are neither significant increases nor contributions to downstream bank erosion and sedimentation of sensitive biological resources; acceptable techniques to control stream sediment include planting riparian vegetation in and near the stream and detention or retention basins.
  - Wildlife habitat and corridors are maintained.
  - Groundwater recharge capability is maintained or improved.

- Within the flood fringe of a SFHA or floodway, permanent structures and fill for permanent structures, roads, and other development are allowed only if the following conditions are met:

  - The development or fill shall not significantly adversely affect existing sensitive biological resources on-site or off site.
  - The development is capable of withstanding flooding and does not require or cause the construction of off-site flood protective works including artificial flood channels, revetments, and levees nor shall it cause adverse impacts related to flooding of properties located upstream or downstream, nor shall it increase or expand a FIRM Zone A.
  - Grading and filling are limited to the minim amount necessary to accommodate the proposed development, harm to the environmental values of the floodplain is minimized including peak flow storage capacity, and wetlands hydrology is maintained.
  - The development neither significantly increases nor contributes to downstream bank erosion and sedimentation nor causes an increase in flood flow velocities or volume.
  - There shall be no significant adverse water quality impacts to downstream wetlands, lagoons, or other sensitive biological resources, and the development is in compliance

with the requirements and regulations of the NPDES as implemented by the City of San Diego.

Mitigation Framework HYD/WQ-2:

Future projects shall be sited and designed to minimize impacts on receiving waters, in particular the discharge of identified pollutants to an already impaired water body. Prior to approval of any entitlements for any future project, the City shall ensure that any impacts on receiving waters shall be precluded and, if necessary, mitigated in accordance with the requirements of the City's Storm Water Runoff and Drainage Regulations (Chapter 14, Article 2, Division 2 of the LDC) and other appropriate agencies (e.g., RWQCB). To prevent erosion, siltation, and transport of urban pollutants, all future projects shall be designed to incorporate any applicable storm water improvement, both off- and on-site, in accordance with the City of San Diego Stormwater Standards Manual.

Storm water improvements and water quality protection measures that shall be required of future projects include:

- Increasing onsite filtration;
- Preserving, restoring, or incorporating natural drainage systems into site design;
- Directing concentrated flows away from MHPA and open space areas. If not possible, drainage shall be directed into sediment basins, grassy swales, or mechanical trapping devices prior to draining into the MHPA or open space areas;
- Reducing the amount of impervious surfaces through selection of materials, site planning, and narrowing of street widths where possible;
- Increasing the use of vegetation in drainage design;
- Maintaining landscape design standards that minimize the use of pesticides and herbicides; and
- To the extent feasible, avoiding development of areas particularly susceptible to erosion and sediment loss.

San Diego Regional Water Quality Control Board and Municipal Code Compliance

- The requirements of the RWQCB for storm water quality are addressed by the City in accordance with the City NPDES requirements and the participation in the regional permit with the RWQCB.
- Prior to permit approval, the City shall ensure any impacts on receiving waters are precluded or mitigated in accordance with the City of San Diego Stormwater Regulations.

- In accordance with the City of San Diego Stormwater Standards Manual, development shall be designed to incorporate on-site storm water improvements satisfactory to the City Engineer and shall be based on the adequacy of downstream storm water conveyance.

GEOLOGY AND SOILS

Mitigation Framework GEO-1:

Impacts associated with geologic hazards shall be mitigated at the project-level through adherence to the City's Seismic Safety Study and recommendations of a site-specific geotechnical report prepared in accordance with the City's Geotechnical Report Guidelines. Impacts shall also be avoided or reduced through engineering design that meets or exceeds adherence to the City's Municipal Code and the California Building Code. More specifically, compressible soils impacts shall be mitigated through the removal of undocumented fill, colluvium/topsoil, and alluvium to firm the ground. Future development shall also be required to clean up deleterious material and properly moisture, condition, and compact the soil in order to provide suitable foundation support. Regarding impacts related to expansive soils, future development shall be required to implement typical remediation measures, which shall include placing a minimum 5-foot cap of low expansive (Expansion Index [EI] of 50 or less) over the clays; or design of foundations and surface improvements to account for expansive soil movement.

Mitigation Framework GEO-2:

As part of the future development permitting process, the City shall require individual projects to adhere to the Grading Regulation and NPDES permit requirements. All subsequent projects developed in accordance with the CPU shall also adhere to the California Building Code to avoid or reduce geologic hazards to the satisfaction of the City Engineer.

Submittal, review, and approval of site specific geotechnical investigations shall be completed in accordance with the City's Municipal Code requirements. Engineering design specifications based on future project-level grading and site plans shall be incorporated into all future projects implemented in accordance with the CPU to minimize hazards associated with site-level geologic and seismic conditions satisfactory to the City Engineer and shall include the following measures to control erosion during and after grading or construction:

- Desilting basins, improved surface drainage, or planting of ground covers installed early in the improvement process in areas that have been stripped of native vegetation or areas of fill material;

- Short-term measures, such as sandbag placement and temporary detention basins;

- Restrictions on grading during the rainy season (November through March), depending on the size of the grading operation, and on grading in proximity to sensitive wildlife habitat; and

- Immediate post-grading slope revegetation or hydroseeding with erosion-resistant species to ensure coverage of the slopes prior to the next rainy season.

Conformance to mandated City grading requirements shall ensure that future grading and construction operations would avoid significant soil erosion impacts. Furthermore, any development involving clearing, grading, or excavation that causes soil disturbance of one or more acres, or any project involving less than one acre that is part of a larger development plan, shall be subject to NPDES General Construction Storm Water Permit provisions. Additionally, any development of this significant size within the City shall be required to prepare and comply with an approved SWPPP that shall consider the full range of erosion control BMPs such as, but not limited to, including any additional site-specific and seasonal conditions. Project compliance with NPDES requirements would significantly reduce the potential for substantial erosion or topsoil loss to occur in association with new development.

Prior to obtaining grading permits for future actions a site-specific geotechnical investigation shall be completed as necessary in accordance with the City of San Diego Guidelines for Preparing Geotechnical Reports. Engineering design specifications based on project-level grading and site plans shall be incorporated into the project design to minimize hazards associated with site-level geologic and seismic conditions satisfactory to the City Engineer. Measures designed to reduce erosion at the project-level shall include the following:

- Control erosion by minimizing the area of slope disturbance and coordinate the timing of grading, resurfacing, and landscaping where disturbance does occur.
- On sites for industrial activities require reclamation plans that control erosion, where feasible, in accordance with the LDC.
- Control erosion caused by storm runoff and other water sources.
- Preserve as open space those hillsides characterized by steep slopes or geological instability in order to control urban form, insure public safety, provide aesthetic enjoyment, and protect biological resources.
- Replant with native, drought-resistant plants to restore natural appearance and prevent erosion.
- Practice erosion control techniques when grading or preparing building sites.
- Utilize ground cover vegetation when landscaping a development in a drainage area to help control runoff.
- Incorporate sedimentation ponds as part of any flood control or runoff control facility.
- During construction, take measures to control runoff from construction sites. Filter fabric fences, heavy plastic earth covers, gravel berms, or lines of straw bales are a few of the techniques to consider.
- Phase grading so that prompt revegetation or construction can control erosion. Only disturb those areas that will later be resurfaced, landscaped, or built on. Resurface parking lots and roadways as soon as possible, without waiting until completion of construction.

- Promptly revegetate graded slopes with groundcover or a combination of groundcover, shrubs, and trees. Hydroseeding may substitute for container plantings. Groundcovers shall have moderate to high erosion control qualities.

- Where necessary, design drainage facilities to ensure adequate protection for the community while minimizing erosion and other adverse effects of storm runoff to the natural topography and open space areas.

- Ensure that the timing and method of slope preparation protects natural areas from disturbance due to erosion or trampling. The final surface shall be compacted and spillovers into natural areas shall be avoided.

- Plant and maintain natural groundcover on all created slopes.

When required, the geologic technical report shall consist of a preliminary study, a geologic reconnaissance, or an in-depth geologic investigation report that includes field work and analysis. The geologic reconnaissance report and the geologic investigation report shall include all pertinent requirements as established by the Building Official. In addition, the Building Official shall require a geologic reconnaissance report or a geologic investigation report for any site if the Building Official has reason to believe that a geologic hazard may exist at the site. Section 145.1802 of the San Diego Municipal Code discusses in more detail the requirements related to the geotechnical report outlined in the SDSSS (City of San Diego, 2016).

NOISE

Mitigation Framework NOI-1:

Prior to the issuance of building permits, site-specific exterior noise analyses that demonstrate that the project would not place residential receptors in locations where the exterior existing or future noise levels would exceed the noise compatibility standards of the City's General Plan shall be required as part of the review of future residential development proposals. Noise reduction measures, including but not limited to building noise barriers, increased building setbacks, speed reductions on surrounding roadways, alternative pavement surfaces, or other relevant noise attenuation measures, may be used to achieve the noise compatibility standards. Exact noise mitigation measures and their effectiveness shall be determined by the site-specific exterior noise analyses.

Mitigation Framework NOI-2:

When building plans are available and prior to the issuance of building permits, site specific interior noise analyses demonstrating compliance with the interior noise compatibility standards of the City's General Plan and other applicable regulations shall be prepared for noise sensitive land uses located in areas where the exterior noise levels exceed the noise compatibility standards of the City's General Plan. Noise control measures, including but not limited to increasing roof, wall, window, and door sound attenuation ratings, placing HVAC in noise reducing enclosures, or designing buildings so that no windows face freeways or major roadways may be used to achieve

the noise compatibility standards. Exact noise mitigation measures and their effectiveness shall be determined by the site specific exterior noise analyses.

Mitigation Framework NOI-3:

Prior to the issuance of a building permit, a site-specific acoustical/noise analysis of any on-site generated noise sources, including generators, mechanical equipment, and trucks, shall be prepared which identifies all noise-generating equipment, predicts noise levels at property lines from all identified equipment, and recommends mitigation to be implemented (e.g., enclosures, barriers, site orientation), to ensure compliance with the City's Noise Abatement and Control Ordinance. Noise reduction measures shall include building noise-attenuating walls, reducing noise at the source by requiring quieter machinery or limiting the hours of operation, or other attenuation measures. Additionally, future projects shall be required to buffer sensitive receptors from noise sources through the use of open space and other separation techniques as recommended after thorough analysis by a qualified acoustical engineer. Exact noise mitigation measures and their effectiveness shall be determined by the site-specific noise analyses.

Mitigation Framework NOI-4:

For projects that exceed daily construction noise thresholds established by the City of San Diego, best construction management practices shall be used to reduce construction noise levels to comply with standards established by the Municipal Code in Chapter 5, Article 9.5, Noise Abatement and Control. Project applicant shall prepare and implement a Construction Noise Management Plan. Appropriate management practices shall be determined on a project-by-project basis, and are specific to the location. Control measures shall include:

a. Minimizing simultaneous operation of multiple construction equipment units;

b. Locating stationary equipment as far as reasonable from sensitive receptors;

c. Requiring all internal combustion-engine-driven equipment to be equipped with mufflers that are in good operating condition and appropriate for the equipment; and

d. Construction of temporary noise barriers around construction sites that block the line-of-sight to surrounding receptors.

PALEONTOLOGICAL RESOURCES

Mitigation Framework PALEO-1:

Prior to the approval of development projects implemented in accordance with the CPU, the City shall determine, based on review of the project application submitted under CPIOZ TYPE B and recommendations of a project-level analysis of potential impacts on paleontological resources completed in accordance with the steps presented below. Future projects shall be sited and designed to minimize impacts on paleontological resources in accordance with the City's Paleontological Resources Guidelines and CEQA Significance Thresholds. Monitoring for paleontological resources required during construction activities shall be implemented at the

project-level and shall provide mitigation for the loss of important fossil remains with future discretionary projects that are subject to environmental review.

I. Prior to Project Approval

A. The environmental analyst shall complete a project-level analysis of potential impacts on paleontological resources. The analysis shall include a review of the applicable USGS Quad maps to identify the underlying geologic formations, and shall determine if construction of a project would:

- Require over 1,000 cubic yards of excavation and/or a 10-foot, or greater, depth in a high resource potential geologic deposit/formation/rock unit.
- Require over 2,000 cubic yards of excavation and/or a 10-foot, or greater, depth in a moderate resource potential geologic deposit/formation/rock unit.
- Require construction within a known fossil location or fossil recovery site. Resource potential within a formation is based on the Paleontological Monitoring Determination Matrix.

B. If construction of a project would occur within a formation with a moderate to high resource potential, monitoring during construction would be required.

- Monitoring is always required when grading on a fossil recovery site or a known fossil location.
- Monitoring may also be needed at shallower depths if fossil resources are present or likely to be present after review of source materials or consultation with an expert in fossil resources (e.g., the San Diego Natural History Museum).
- Monitoring may be required for shallow grading (<10 feet) when a site has previously been graded and/or unweathered geologic deposits/formations/rock units are present at the surface.
- Monitoring is not required when grading documented artificial fill. When it has been determined that a future project has the potential to impact a geologic formation with a high or moderate fossil sensitivity rating a Paleontological MMRP shall be implemented during construction grading activities.

TRANSPORTATION/CIRCULATION

Mitigation Framework TRF-1:

Intersections shall be improved per the intersection lane designations identified in [OMCPU Final PEIR] Figure 5.12-4a - g.

UTILITIES AND SERVICE SYSTEMS

Mitigation Framework UTIL-1:

Pursuant to the City's Significance Determination Thresholds, discretionary projects (including construction, demolition, and /or renovation) that would generate 60 tons or more of solid waste shall be required to prepare a Waste Management Plan (WMP). The WMP shall be prepared by the

applicant, conceptually approved by the ESD, and discussed in the environmental document. The WMP shall be implemented by the applicant and address the demolition, construction, and occupancy phases of the project as applicable to include the following:

a. A timeline for each of the three main phases of the project (demolition, construction, and occupancy).

b. Tons of waste anticipated to be generated (demolition, construction, and occupancy).

c. Type of waste to be generated (demolition, construction, and occupancy).

d. Describe how the project will reduce the generation of C&D debris.

e. Describe how the C&D materials will be reused on-site.

f. Include the name and location of recycling, reuse, and landfill facilities where recyclables and waste will be taken if not reused on-site.

g. Describe how the C&D waste will be source separated if a mixed C&D facility is not used for recycling.

h. Describe how the waste reduction and recycling goals will be communicated to subcontractors.

i. Describe how a "buy recycled" program for green construction products, including mulch and compost, will be incorporated into the project.

j. Describe how the Refuse and Recyclable Materials Storage Regulations (LDC Chapter 14, Article 2 Division 8) will be incorporated into design of building's waste storage area.

k. Describe how compliance with the Recycling Ordinance (Municipal Code Chapter 6, Article 6, Division 7) will be incorporated in the operational phase.

l. Describe any International Standards of Operation 1, or other certification, if any.

The above Mitigation Monitoring and Reporting Program will require additional fees and/or deposits to be collected prior to the issuance of building permits, certificates or occupancy and/or final maps to ensure the successful completion of the monitoring program.

GREENHOUSE GAS EMISSIONS

Mitigation Framework GHG-1:

Future projects implemented in accordance with the [CVSP] CPU shall be required to demonstrate their avoidance of significant impacts related to long-term GHG emissions. The Mobility, Urban Design, and Conservation elements of the [CVSP] CPU include specific policies to require dense, compact, and diverse development, encourage highly efficient energy and water conservation

design, increase walkability and bicycle and transit accessibility, increase urban forestry practices and community gardens, decrease urban heat islands, and increase climate sensitive community design. Future projects implemented in accordance with the [CVSP] CPU shall be required to prepare a project-level CAP Consistency Checklist to demonstrate consistency.

Mitigation Framework GHG-2:

Future projects implemented in accordance with the CPU shall be required to demonstrate their avoidance of significant impacts related to long-term operational emissions as identified in mitigation measure GHG-1 in Section 5.18.3.3. The approximate gap of 16.9 to 19.2 percent in meeting the target reductions shall consist of one or a combination of several effective and quantifiable GHG reduction measures that pertain to: building and non-building energy use; indoor and outdoor water use; area sources; solid waste disposal; vegetation/carbon sequestration; construction equipment; and transportation/vehicles. Project-level GHG reduction design features shall demonstrate a reduction in BAU GHG emissions to 28.3 percent or more relative to BAU, and to the extent practicable, shall be required for future development projects implemented in accordance with the CPU.

Project-Specific Mitigation Measures

Project-Specific Document Submittal/Inspection Checklist

Issue Area	Document Submittal	Associated Inspection/Approvals/Notes
General	Consultant Qualification Letters	Prior to Preconstruction Meeting
General	Consultant Construction Monitoring Exhibits	Prior to or at Preconstruction Meeting
Biology	Consultant Qualification Letters	Prior to Preconstruction Meeting
Archaeology	Consultant Qualification Letters	Prior to Preconstruction Meeting
Archaeology	Archaeology Reports	Archaeology/Historic Site Observation
Paleontological Resources	Paleontological Mitigation, Monitoring, and Reporting Program (MMRP)	Prior to Issuance of Grading Permits
Bond Release	Request for Bond Release Letter	Final MMRP Inspections Prior to Bond Release Letter

The following mitigation measures shall be required at the Project level as part of the OMCPU Final PEIR Mitigation Measures and are not the result of new or increased impacts as compared to the OMCPU Final PEIR. In accordance with the OMCPU Final PEIR Mitigation Measures, the following site-specific mitigation measures would apply to the Project.

AIR QUALITY

MM-1 Best construction management practices shall be incorporated to ensure daily construction emissions remain below daily emission standards established by the City of San Diego. In order to ensure compliance, prior to issuance of a grading permit, the grading contractor shall provide a letter with the following components:

a. Confirmation that the construction/grading equipment meets current air quality regulations;

b. Identification of a maximum number of trucks that would be located on-site during construction;

c. Confirmation that the simultaneous operation of multiple pieces of construction equipment will be minimized;

e. Confirmation that idling time by construction vehicles will be minimized.

BIOLOGICAL RESOURCES

MM-2 To avoid any direct impacts to raptors and/or any native/migratory birds (specifically including the southern California rufous crowned sparrow and loggerhead shrike that have moderate potential to occur on site), removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur (based on construction timing) during the breeding season, the Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds on the proposed area of disturbance. The pre-construction survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the pre-construction survey to City Development Services Department for review and approval prior to initiating any construction activities. If nesting birds are detected, a letter report or mitigation plan in conformance with the City's Biology Guidelines and applicable State and federal law (i.e., appropriate follow up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report or mitigation plan shall be submitted to the City Development Services Department for review and approval and implemented to the satisfaction of the City. The City's MMC Section or Resident Engineer, and Qualified Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction. If nesting birds are not detected during the preconstruction survey, no further mitigation is required.

HISTORICAL RESOURCES

MM-3 **I. Prior to Permit Issuance**

A. Entitlements Plan Check

1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for Archaeological Monitoring and Native American monitoring have been noted on the applicable construction documents through the plan check process.

B. Letters of Qualification have been submitted to ADD

1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and

the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.

2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG.
3. Prior to the start of work, the applicant must obtain written approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to MMC that a site-specific records search (1/4 mile radius) has been completed. Verification includes, but is not limited to a copy of a confirmation letter from South Coastal Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
3. The PI may submit a detailed letter to MMC requesting a reduction to the ¼ mile radius.

B. PI Shall Attend Precon Meetings

1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.

a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.

2. Identify Areas to be Monitored

a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits.

b. The AME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).

3. When Monitoring Will Occur

a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.

b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. Monitor(s) Shall be Present During Grading/Excavation/Trenching

1. The Archaeological Monitor shall be present full-time during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances OSHA safety requirements may necessitate modification of the AME.
2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and MMC. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop and the Discovery Notification Process detailed in Section III.B-C and IV.A-D shall commence.
3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present.
4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.

B. Discovery Notification Process

1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to digging, trenching, excavating or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the RE or BI, as appropriate.
2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.
4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered.

C. Determination of Significance

1. The PI and Native American consultant/monitor, where Native American resources are discovered shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below.
   a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required.
   b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) which has been reviewed by the Native American consultant/monitor, and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume. Note: If a unique archaeological site is also an historical resource as defined in CEQA, then the limits on the amount(s) that a project applicant may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.
   c. If the resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.

IV. Discovery of Human Remains

If human remains are discovered, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:

A. Notification
   1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior Planner in the Environmental Analysis Section (EAS) of the Development Services Department to assist with the discovery notification process.
   2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.

B. Isolate discovery site
   1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenance of the remains.
   2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenance.
   3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin.

C. If Human Remains ARE determined to be Native American
   1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, ONLY the Medical Examiner can make this call.
   2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.

3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources and Health & Safety Codes.
4. The MLD will have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods.
5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if:

a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being granted access to the site, OR;
b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, the landowner shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance, THEN
c. To protect these sites, the landowner shall do one or more of the following:
   (1) Record the site with the NAHC;
   (2) Record an open space or conservation easement; or
   (3) Record a document with the County. The document shall be titled "Notice of Reinterment of Native American Remains" and shall include a legal description of the property, the name of the property owner, and the owner's acknowledged signature, in addition to any other information required by PRC 5097.98. The document shall be indexed as a notice under the name of the owner.

V. Night and/or Weekend Work

A. If night and/or weekend work is included in the contract

1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
2. The following procedures shall be followed.

a. No Discoveries
   In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSVR and submit to MMC via fax by 8AM of the next business day.
b. Discoveries
   All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction, and IV – Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery.
c. Potentially Significant Discoveries
   If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction and IV-Discovery of Human Remains shall be followed.
d. The PI shall immediately contact MMC, or by 8AM of the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.

B. If night and/or weekend work becomes necessary during the course of construction
    1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
    2. The RE, or BI, as appropriate, shall notify MMC immediately.
C. All other procedures described above shall apply, as appropriate.

VI. Post Construction

A. Preparation and Submittal of Draft Monitoring Report
    1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring. It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe resulting from delays with analysis, special study results or other complex issues, a schedule shall be submitted to MMC establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.
        a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report.
        b. Recording Sites with State of California Department of Parks and Recreation The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.
    2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
    3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
    4. MMC shall provide written verification to the PI of the approved report.
    5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Artifacts
    1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued
    2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.
    3. The cost for curation is the responsibility of the property owner.

C. Curation of artifacts: Accession Agreement and Acceptance Verification
    1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable.

2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.
3. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV – Discovery of Human Remains, Subsection 5.

D. Final Monitoring Report(s)
1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.
2. The RE shall, in no case, issue the Notice of Completion and/or release of the Performance Bond for grading until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

HUMAN HEALTH/PUBLIC SAFETY/HAZARDOUS MATERIALS

MM-4 To prevent the development of structures that may pose a hazard to air navigation, the City shall inform project applicants for future development concerning the existence of the Part 77 imaginary surfaces and Terminal Instrument Procedures and FAA requirements. The City shall also inform project applicants when proposed projects meet the Part 77 criteria for notification to the FAA as identified in City of San Diego Development Services Department Information Bulletin 520. The City shall not approve ministerial projects that require FAA notification without a FAA determination of "No Hazard to Air Navigation" for the project. Also, the City shall not recommend approval for discretionary projects that require FAA notification without a FAA determination of "No Hazard to Air Navigation" for the project until the project can fulfill state and ALUC requirements.

NOISE

MM-5 During grading activities, best construction management practices shall be used to reduce construction noise levels to ensure compliance with standards established by the Municipal Code in Chapter 5, Article 9.5, Noise Abatement and Control. Project applicant shall prepare and implement a Construction Noise Management Plan. Appropriate management practices shall be determined on a project-by-project basis, and are specific to the location.

PALEONTOLOGICAL RESOURCES

MM-6 **I. Prior to Permit Issuance**

A. Entitlements Plan Check
1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental

designee shall verify that the requirements for Paleontological Monitoring have been noted on the appropriate construction documents.

B. Letters of Qualification have been submitted to ADD
   1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the paleontological monitoring program, as defined in the City of San Diego Paleontology Guidelines.
   2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the paleontological monitoring of the project.
   3. Prior to the start of work, the applicant shall obtain approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search
   1. The PI shall provide verification to MMC that a site-specific records search has been completed. Verification includes, but is not limited to a copy of a confirmation letter from San Diego Natural History Museum, other institution or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
   2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.

B. PI Shall Attend Precon Meetings
   1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified paleontologist shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Paleontological Monitoring program with the Construction Manager and/or Grading Contractor.
      a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.
   2. Identify Areas to be Monitored
      Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits. The PME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).
   3. When Monitoring Will Occur
      a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
      b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of

excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. Monitor Shall be Present During Grading/Excavation/Trenching

1. The monitor shall be present full-time during grading/excavation/trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. **The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances OSHA safety requirements may necessitate modification of the PME.**
2. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as trenching activities that do not encounter formational soils as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for resources to be present.
3. The monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (**Notification of Monitoring Completion**), and in the case of ANY discoveries. The RE shall forward copies to MMC.

B. Discovery Notification Process

1. In the event of a discovery, the Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.
2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.

C. Determination of Significance

1. The PI shall evaluate the significance of the resource.
   a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. The determination of significance for fossil discoveries shall be at the discretion of the PI.
   b. If the resource is significant, the PI shall submit a Paleontological Recovery Program (PRP) and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.
   c. If resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils) the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been made. The Paleontologist shall continue to monitor the area without notification to MMC unless a significant resource is encountered.

d. The PI shall submit a letter to MMC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.

IV. Night and/or Weekend Work

A. If night and/or weekend work is included in the contract
   1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
   2. The following procedures shall be followed.
      a. No Discoveries
         In the event that no discoveries were encountered during night and/or weekend work, The PI shall record the information on the CSVR and submit to MMC via fax by 8AM on the next business day.
      b. Discoveries
         All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction.
      c. Potentially Significant Discoveries
         If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed.
      d. The PI shall immediately contact MMC, or by 8AM on the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.

B. If night work becomes necessary during the course of construction
   1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
   2. The RE, or BI, as appropriate, shall notify MMC immediately.

C. All other procedures described above shall apply, as appropriate.

V. Post Construction

A. Preparation and Submittal of Draft Monitoring Report
   1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Paleontological Guidelines which describes the results, analysis, and conclusions of all phases of the Paleontological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring,
      a. For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report.
      b. Recording Sites with the San Diego Natural History Museum
   1. The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the Paleontological Monitoring Program in accordance with the City's Paleontological Guidelines, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report.
   2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.

3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
4. MMC shall provide written verification to the PI of the approved report.
5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Fossil Remains
1. The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued.
2. The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate

C. Curation of fossil remains: Deed of Gift and Acceptance Verification
1. The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for this project are permanently curated with an appropriate institution.
2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.

D. Final Monitoring Report(s)
1. The PI shall submit two copies of the Final Monitoring Report to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.
2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

TRANSPORTATION/CIRCULATION

Mitigation for Near-Term Year Plus Project (Opening Day) 2027 Direct Traffic Impacts

MM-7 Prior to issuance of the first building permit, Owner/Permittee shall assure by permit and bond the signalization of the intersection of Cactus Road and Airway Road, satisfactory to the City Engineer. Improvements shall be completed and operational prior to first occupancy.

MM-8 Prior to issuance of the first building permit, Owner/Permittee shall assure by permit and bond the construction of Cactus Road between Airway Road and Central Main Street as a 3-lane Major (two lanes southbound, one lane northbound with 16-foot raised median), satisfactory to the City Engineer. Improvements shall be completed and operational prior to first occupancy.

MM-9 Prior to issuance of the first building permit, Owner/Permittee shall assure by permit and bond the construction of Cactus Road between Central Main Street and Street "C" as a 3-lane Major (two lanes southbound, one lane northbound with 16-foot raised median), satisfactory to the City Engineer. Improvements shall be completed and operational prior to first occupancy.

Mitigation for Community Buildout Plus Project Cumulative Traffic Impacts

MM-10 Prior to issuance of the first building permit, Owner/Permittee shall make a 0.63% fair-share contribution towards the following improvements at the intersection of Cactus Road and Airway Road, satisfactory to the City Engineer:

- Widen of the eastbound approach (Airway Road) to accommodate dual left-turn lanes, three through lanes with a shared right-turn lane, and an exclusive right-turn lane;
- Widen the southbound approach (Cactus Road) to accommodate dual left-turn lanes, two through lanes with a shared right-turn lane and an exclusive right-turn lane;
- Widen the westbound approach to accommodate dual left-turn lanes, three through lanes and dual right-turn lanes; and
- Widen the northbound approach to accommodate dual left-turn lanes, two through lanes and an exclusive right-turn lane.

MM-11 Prior to issuance of the first building permit, Owner/Permittee shall make a 0.22% fair-share contribution towards the following improvements at the intersection of Cactus Road and Siempre Viva Road, satisfactory to the City Engineer:

- Widen the northbound approach to accommodate an exclusive right-turn lane.

MM-12 Prior to issuance of the first building permit, Owner/Permittee shall make a 25% fair-share contribution toward the following improvements at the intersection of Cactus Road and Street "C", satisfactory to the City Engineer. Payment shall be made to a Developer Contribution Fund. (Per TRF-1 in the Central Village Specific Plan Addendum to the OMCPU PEIR, March 17, 2017)

- Traffic signal infrastructure installation.

MM-13 Prior to issuance of the first building permit, Owner/Permittee shall make a 1.35% fair-share contribution towards the following improvements at the intersection of Cactus Road and Central Main Street, satisfactory to the City Engineer:

- Traffic signal infrastructure installation.

IX. CERTIFICATION

Copies of the addendum, certified Program Environmental Impact Report, Mitigation Monitoring and Reporting Program, and associated project-specific technical appendices, if any, may be accessed on the City's CEQA webpage at https://www.sandiego.gov/ceqa/final.

E. Shearer Nguyen,
Senior Planner
Development Services Department

February 4, 2021
Date of Final Report

Attachments:

Figure 1: Tentative Map No. 2240042
Figure 2: Land Use Plan
Figure 3: Aerial Photograph
Figure 4: Regional Map
Figure 5: Vicinity Map

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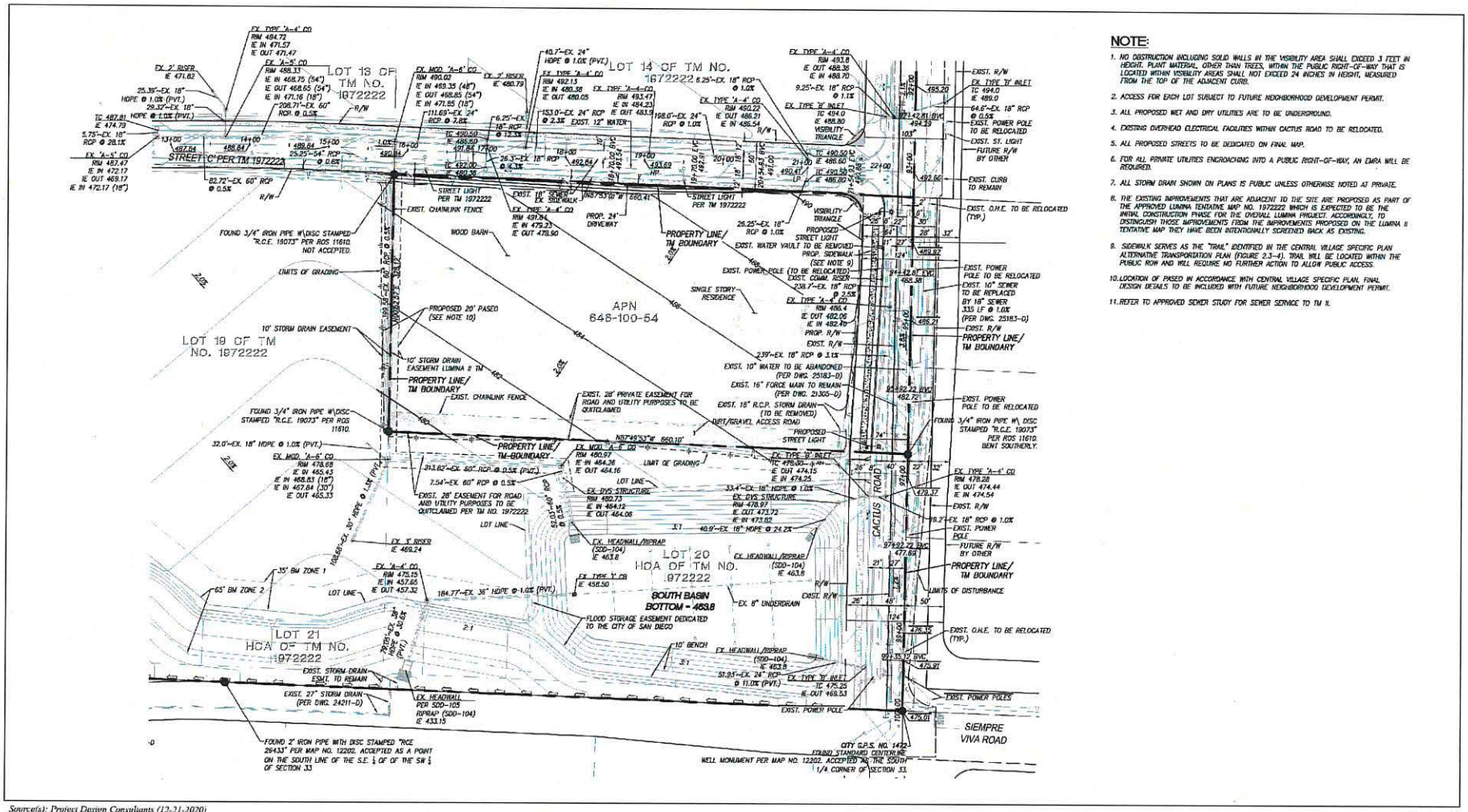
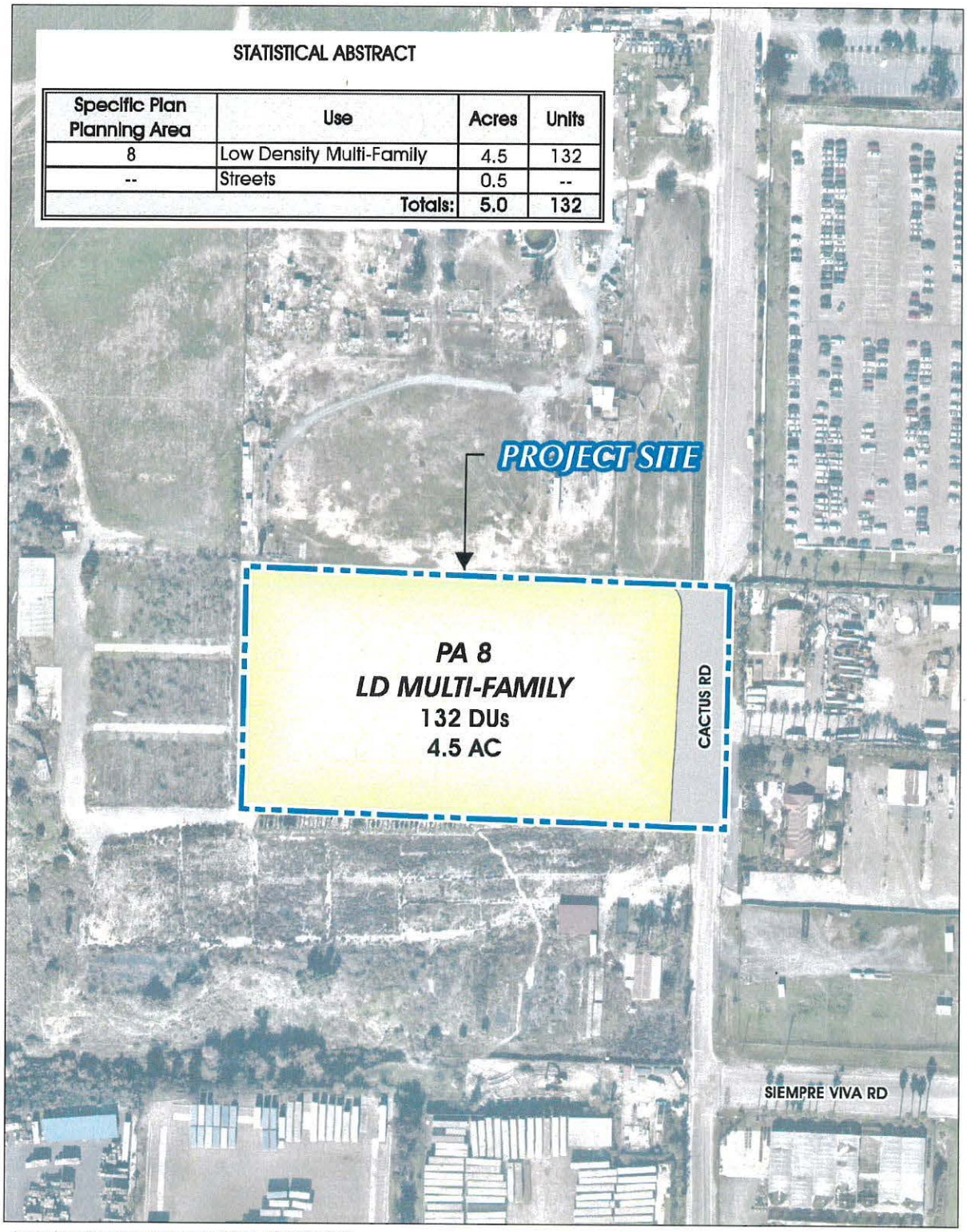


Source(s): Project Design Consultants (12-21-2020)

Not to Scale

Figure 1

TENTATIVE MAP NO. 2240042



Source(s): ESRI, Nearmap Imagery (2019), SANGIS (2018)

0 50 100 200 Feet

Figure 2

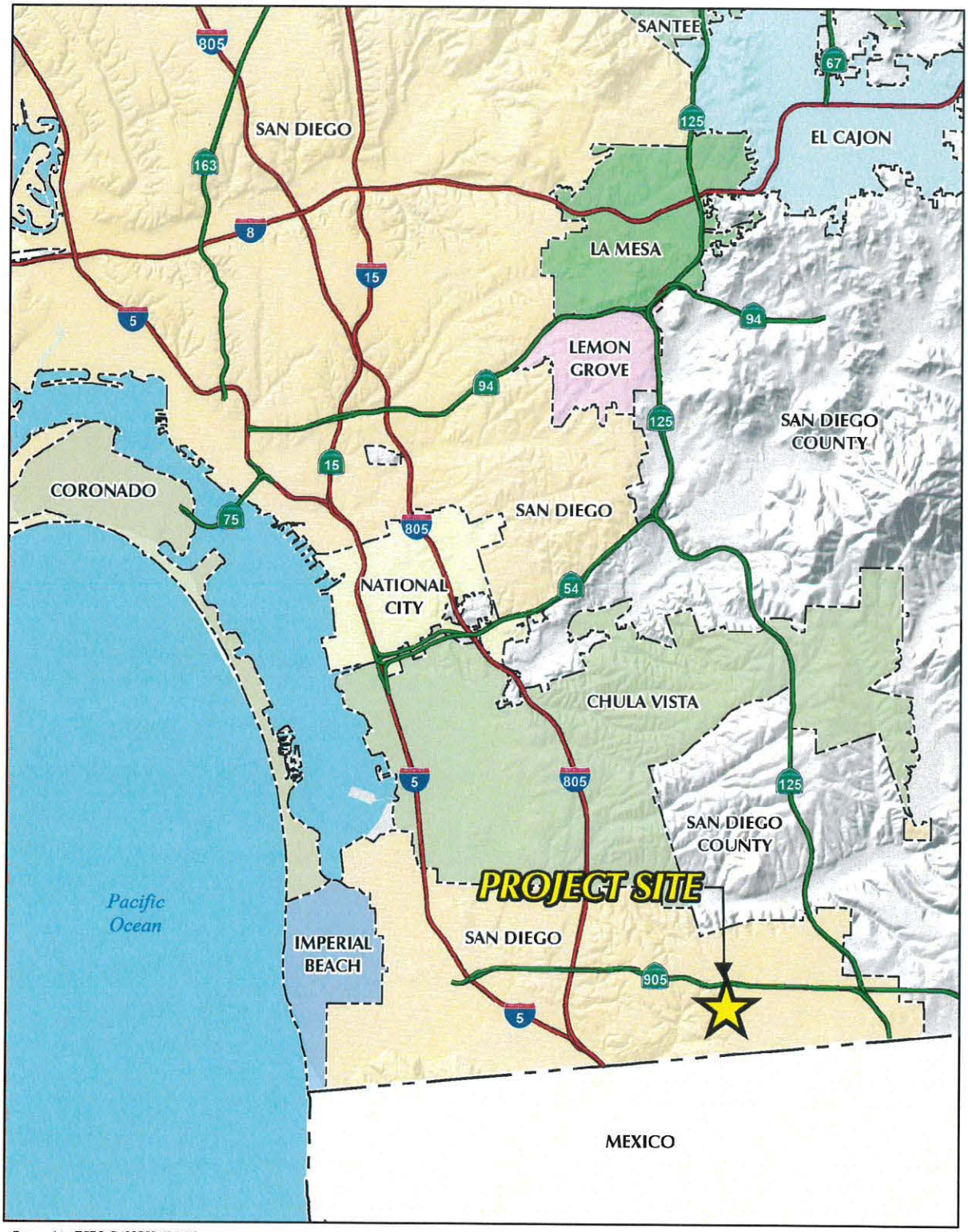
LAND USE PLAN

Source(s): ESRI, Nearmap Imagery (2019), SANGIS (2018)

0 50 100 200 Feet

Figure 3

AERIAL PHOTOGRAPH



Source(s): ESRI, SANGIS (2018)

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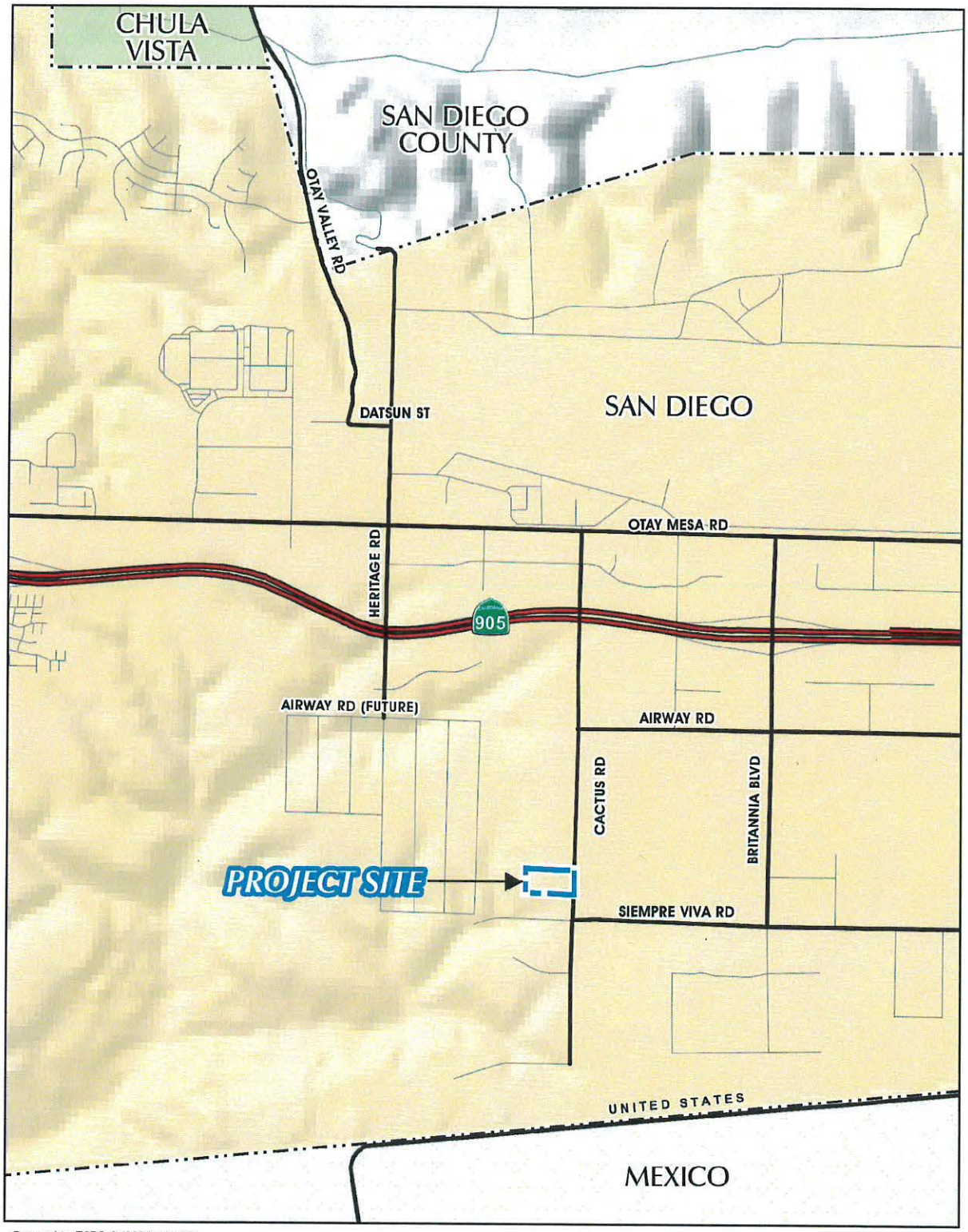
Figure 4

REGIONAL MAP



Source(s): ESRI, SANGIS (2018)

0 500 1,000 2,000 Feet

Figure 6

VICINITY MAP